

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Apendices	Manfred Bialonczyk, BMVIT	081	The bold letters used for the terms which have been changed from "ECAR-M" should not be used.	Editorial	Text changed.
Appendix 1	CAA UK	123	The owner entrusts <u>to</u> The word 'to' is missing. organisation with the management' The word 'with' is missing		Text changed but not as proposed.
Appendix 1	CAA UK	123	Add words to para. 8 "The owner certifies, <u>to the best of his / her belief, that..</u> "		Text changed but not as proposed.
Appendix 1	CAA UK	123	Copying the Continuing Airworthiness Agreement to the competent authority is not considered necessary by the UK CAA		This is required information purposes such as tracking where the aircraft is in the case of an urgent problem. No text change.
Appendix 1	DGAC, France	162	<p>When an owner contracts an approved organisation in accordance with M.A.201 to carry out continuing airworthiness management tasks, a copy of the present document relevant parts of the arrangement shall be sent by the owner to the competent authority of the Member State where the aircraft is registered of Registry once it has been signed by both parties.</p> <p>The present document has been elaborated taking into account the prescriptions of Part M and defines the obligations of the signatories in relation to continuing airworthiness of the following, referred to below as the aircraft.</p> <p>Aircraft Registration: Aircraft Type: Aircraft Serial NR: The undersigned owner or registered lessee of the aircraft will be referred to below as the owner. Name or Company Name: Address: The undersigned M.A. subpart G approved continuing airworthiness organisation will be referred to below as the approved organisation: Organisation Name: Address: The arrangement shall contain: name and address of the owner and of the contracted or</p>	<p>Clarification The appendix should not advocate a specific contract but rather specify the content of such arrangement.</p>	Contract format removed. Text changed but not as proposed.

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Appendix 1			<p>In case of any non-conformity with this arrangement, by either of the signatories, it will become null. In such a case, the owner will retain full responsibility for every task linked to the continuing airworthiness of the aircraft and the owner will undertake to inform the airworthiness authorities of the Member State where the aircraft is registered within two full weeks.</p> <p>Place: Date: The Owner: The Organisation: Obligations of the approved organisation: 1. have the aircraft's type in the scope of its approval; 2. respect the conditions to maintain the continuing airworthiness of the aircraft listed below: develop a maintenance programme for the aircraft, including any reliability programme developed, organise the approval of the aircraft's maintenance programme, once it has been approved, give a copy of the aircraft's maintenance programme to the owner, organise a bridging inspection with the aircraft's prior maintenance programme, organise for all maintenance to be carried out by an approved maintenanc</p>		Contract format removed. Text changed but not as proposed.

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Appendix 1			<p>5. inform the airworthiness Member State of registry whenever the aircraft is not presented to the approved maintenance organisation by the owner as requested by the approved organisation;</p> <p>6. inform the airworthiness authorities of the Member State of registry whenever the present arrangement has not been respectedowner does not fulfil its obligations under this appendix;</p> <p>7. carry out the airworthiness review of the aircraft when necessary and fill the airworthiness review certificate or the recommendation to the Member State of registry;</p> <p>8. carry out all occurrence reporting mandated by applicable regulations;</p> <p>9. inform the authorities of the Member State of registry whenever the present arrangement is denounced by either party.</p> <p>Obligations of the owner:</p> <ol style="list-style-type: none"> 1. have a general understanding of the approved maintenance programme; 2. have a general understanding of Part M; 3. present the aircraft to the approved maintenance organisation agreed with the approved organisation at the due time designated by the approved 		Contract format removed. Text changed but not as proposed.
Appendix 1	IVW, The Netherlands	99	<p>CAA-NL does not want to receive a copy of al the signed agreements, This is typically something you ask for during inspections. CAA-NL suggests to delete this obligation. This also has consequences for the obligations of the approved organisation and the owner as stated in this appendix, and CAA-NL suggests to amend these accordingly.</p>		This is required in order to track where the aircraft is. No text change.
Appendix 1	Martin Ambrose, ERA	079	This appendix states that is the obligation of the organisation to develop a maintenance programme for the aircraft. In the case where the G1 organisation differs from the owner/operator, who would own the maintenance programme developed under this obligation?		The G1 will own the program and therefore a bridging check is an obligation under the contractual arrangements. M.A.307 requires transfer of data. No text change.
Appendix 1	Martin Ambrose, ERA	079	Paragraph 3 of "Obligations of the approved organisation" uses the word "embedded" in respect of modifications. I believe this should be amended to read "embodied".		Text changed.
Appendix 1	Manfred Bialonczyk, BMVIT	081	Signature of the approved organisation should be added at the bottom of the first page.	Editorial	This is required information purposes such as tracking where the aircraft is in the case of an urgent problem. No text change.

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Appendix 1	Europe Air Sports	73		<p>This should only apply to large aircraft. It is unworkable and unnecessary for light aircraft. It adds nothing to safety, but increases bureaucracy and cost</p> <p>This requirement must cater for alternatives to "approved maintenance organisation, unless it recognised that a NGB for an air sport can itself be an approved maintenance organisation in which volunteer personnel can be approved, as is currently the case in many Member States.</p> <p>This requirement makes the system active rather than passive, and is unnecessary for light aircraft, balloons and gliders. It is the responsibility of the owner to meet the maintenance and C of A requirements, otherwise the aircraft etc airworthiness is not valid. See also item 3 of "obligations of the owner"</p> <p>Same comment as above.</p>	<p>The Regulation defines large aircraft. This has been done as the continuing airworthiness requirements for light aircraft are much less stringent. They correspond to the minimum requirements set forth by ICAO:</p> <ul style="list-style-type: none"> - The Subpart G organisation is not compulsory for the management of aircraft and replaces the competent authority for the airworthiness review. - The Subpart F organisation is not compulsory except for components. <p>A simple aircraft can according to Part-M be maintained by a licensed engineer with tools, facilities and data which do not have to be individually owned.</p> <p>The competent authority is designated by the member state according to M1. A Member State may nominate an NGB or an other organisation as the competent authority for certain aircraft.</p> <p>No text change.</p>
Appendix 2	DGAC, France	162	<p>In all the appendix replace "should" by "shall"</p> <p>replace "Part 145" by "Part M"</p> <p>Change Block 13 and 19:</p> <p>13. Remarks</p> <p>Part-M Subpart F.1 organisation approval number19. Part 145.50 Release to Service Other regulation specified in block 13</p> <p>Part M.801 Release to Service</p> <p>Certifies that unless otherwise specified in block 13, the work identified in block 12 and described in block 13, was accomplished in accordance with Part 145the relevant regulation and in respect to that work the items are considered ready for release to service</p>	<p>Editorial</p> <ul style="list-style-type: none"> - "shall" must be used in a requirement <p>Release according Part M should be considered as normal.</p>	<p>Text changed.</p>

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Appendix 2	Aerospace Industries	170	(Paragraphs 4 & 5) We strongly urge that all Form 1 certificates be prepared in English or contain an English translation on the form. The current proposed language is permissive and does not require the use of English. Aviation is an international business and English has been the standard for return-to-service documentation. To allow other languages without requiring accompanying English translation places a burden on the industry and will lead to problems. This will also adversely affect the current harmonization of the forms with the FAA and TCCA.		Text changed.
Appendix 2	Aerospace Industries	170	2. Block 8 Instructions: There are “non-part-numbered” subassemblies that are sometimes repaired. These are assemblies of parts that are later joined to either other subassemblies or parts to complete a larger assembly that has a part number. The issue is what to state in the part number block. This has been done in two ways but has not been standard. One way is to state the higher assembly number with an asterisk (*) and explain in block 13 that it is a subassembly of that part with a short description of what it is. The other has been to list the part numbers. On a large subassembly, listing all the part numbers is cumbersome. We recommend that guidance be provided that allows either approach to be used at the discretion of the authorized maintenance facility dependent upon the situation.		Reference to the lower level parts should be made if there is no part number for the assembly. A reference in block 13 to an attached document may be used if there are too many references. This is already common practice and is not contradictory to the rule. No text change.
Appendix 2	Aerospace Industries	170	2. Block 12, 4 Instructions: Revise as follows: 4 ‘REPAIRED’ The restoration of an item, <u>or specific repair(s) of an item</u> , to a serviceable condition in conformity with an approved standard (*). <i>Comment: Many times an item will be sent to an authorized maintenance facility for a speciality repair rather than a repair of the whole part that may be completed by another facility. Thus, this circumstance must be provided for.</i>		This is already provided for in the rule. One only releases the work ordered. If the part was not fully repaired, i.e. " a specialised repair" it should be stated in bloc 13 as incomplete maintenance. No text change.
Appendix 2	Aerospace Industries	170	2. Block 13 - The identity and issue of maintenance documentation. <i>Comment: This “requirement” is not a regulatory requirement, as it is not specified by 145.A.50(d). Therefore, it should be removed.</i> - Release statements to satisfy international bilateral agreements. <i>Comment: There is no mention of an EASA bilateral, which should be provided for. This also indicates that after the commencement of EASA that the U.S. and Canadian bilaterals remain in force.</i>		Bilateral agreements prevail over Part-145 where applicable. No text change.
Appendix 2	LBA	57	The appendix 2 should be standardized with Appendix I of Part 145.		Standardised. Text changed.

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Appendix 2	IVW, The Netherlands	99	Instructions on Block 13 of form One: CAA-NL suggests to change the following sentence "Identity of national regulation if not Part 145" into " Identity of other regulation if not Part 145 " since no national regulations on airworthiness will exist after 28-9-2003, but Part M subpart F is eligible to issue Form Ones. This also has consequences for the instruction on Block 19 where "national" should be replaced by "other".		Text changed.
Appendix 2	ENAC, Italy	119	Affected document paragraph or article: Appendix 2 to Part M, Appendix 1 to Part 145, Appendix to Part 21(GM no.1 to 21.A.130(b), GM 21A.163(c)) Appendix 6 <u>POSITION:</u> (cross out the parts that are not applicable) Agree / Accept / No comment / Propose different text / General comment / Propose to delete paragraph. Instructions for completion of EASA Form One are attached to the Parts M & 145, whilst they are not included in the appendix to Part 21 but the form. Maintenance release and certification of new components should be treated in the same manner. Transfer either GM no 1 to 21A.130(b) and 21A.163(c) material in the appendix to Part 21 or the maintenance Appendices in the relevant AMC&GM material. NOTE: consistency with the mandatory instructions of the other Part 21 forms (eg EASA form 52) should be ensured.		The intent is to make the Form 1 completion procedures rule material not only the format of the form. No text change.
Appendix 2	Michael Loges, Rolls-Royce, Germany	062	EASA Form One has no provisions to be used to constitute a release to service by a Part M maintenance organisation. The EASA Form One should be governed only by one Part, either Part M or Part 145, preferably by Part M and constitute a release to service for any maintenance organisation and therefore be deleted from the other Part and only be referenced there.		This is dealt with as "other regulation" specified in Block 19 and details must be specified in Block 13. Today, the Form 1 is commonly used in EU Member States for releases by organisations holding national maintenance approvals. The internet here is not to change practices already widely used in the EU today. Furthermore, the Form 1 is harmonised with the FAA 8130-3 for instance. Any change to this form would therefore create new problems. No text change.
Appendix 2, 13	Martin Ambrose, ERA	079	This paragraph contains errors. The second line of this paragraph use the phrase "an Part 145 approved maintenance organisation". This should be amended to read "a Part 145 approved maintenance organisation".		Text changed.

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Appendix 2, 13	Michael Loges, Rolls-Royce, Germany	062	The text refers to only part 145 and not to Part M Subpart F. This is only acceptable, when all Maintenance organisations are covered by Part 145 and Part M Subpart F is deleted. The different releases for common used components under Part 145 or Part M will create a lot of confusion within the aviation maintenance community.		Text changed.
Appendix 3	DGAC, France	162	See Attachment: See comments from DGAC France, comment number 46.	<p>The forms should be given a specific number, instead of XXa and XXb, which should be mentioned on the form</p> <ul style="list-style-type: none"> - There is a need for some explanation of the form as in appendix 2 for Form one - On form XXa, which is filled by the approved organisation, there is no need to have the name of the approving Member State as this is an EASA form and not a State form - The appendix should identify those part of the certificate which are intangible from those which need to be filled. - The ARC is part of the C of A for which ICAO Annex 8 (Part II – 3.3.2) requires an English translation. - The ARC should give the date when the next airworthiness review rather than a date of expiry (the ARC is juts a statement that an airworthiness review was done at a specific date and that another one is due later) <p><i>Note if option B is chosen and it is left to the States to decide who can carry out the review and sign the certificate, the form will have to be adapted accordingly.</i></p>	Form numbered as 15. AMC explains completion of the form. Text changed but not as proposed.
Appendix 3	LBA	57	More AMC material is needed to describe the transfer procedure of aircraft registration within the EU (e.g. In which way does the “new authority” validate the registration on the ARC?)		AMC has been produced. No text change.
Appendix 3	LBA	57	AMC material is needed to have a standard for the recommendation records which shall be forwarded to the competent authority.		AMC has been produced. No text change.
Appendix 4	DGAC, France	162	Why is there no ratings defined as in table 1 of Appendix II to Part 145 ?	Consistency	Table added. Text changed.

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Appendix 4	LBA	57	The references should be corrected, because the references were copied from Appendix II of Part 145 and were not adjusted to Appendix 5 of Part M.		References corrected. Text changed.
Appendix 4	LFV, Sweden	105	As stated in appendix 4, 2, "in addition to table 1 the approved maintenance" Table 1 is missing in the documentation.		Table added. Text changed.
Appendix 4	Manfred Bialonczyk, BMVIT	081	This Appendix is not in line with Part 145. It should be made in line with Part 145. Tables of Appendix II to Part 145 should be added to Appendix 4 to Part-M	This Appendix is not consistent with Part 145. Also there is no Table 1, which is referenced in the first line of this Appendix.	Text changed.
Appendix 4, 4.	Martin Ambrose, ERA	079	This paragraph contains errors. A full stop (.) needs to be inserted between the words "State" and The on the sixth line.		Text changed.
Appendix 4, 6.	Martin Ambrose, ERA	079	This paragraph contains errors. The fourth line of this paragraph uses the phrase "an Part-M Section A Subpart F approved maintenance organisation". This should be amended to read "a Part-M Section A Subpart F approved maintenance organisation".		Text changed.
Appendix 4, 7.	Martin Ambrose, ERA	079	This paragraph contains errors. The third line of this paragraph uses the phrase "an Part-M Section A Subpart F approved maintenance organisation". This should be amended to read " a Part-M Section A Subpart F approved maintenance organisation".		Text changed.
Appendix 5	DGAC, France	162	See Attachment: See comments from DGAC France, comment number 48.	<u>Implementation problems</u> - There is a need for some explanation of the form as in appendix 2 for Form one - The appendix should identify those part of the certificate which are intangible from those which need to be filled. - See comment to M.A.618 It is more appropriate to refer to this regulation than to Regulation 1592/2002	Text changed but not as proposed.
Appendix 5	LBA	57	In the Approval Schedule the Limitation for the D1 rating should be in correlation with Part 145.		Text changed.
Appendix 5	LFV, Sweden	105	Down the bottom on Form III, it reads "ECAR", should be "EASA".		Text changed.
Appendix 5	Manfred Bialonczyk, BMVIT	081	The name of the Form in the bottom of the Form should be changed from "ECAR Form III" to " EASA Form 3 ".	The name of the Form is not in line with M.B.603 (a).	Text changed.
Appendix 6	DGAC, France	162	Make changes similar to Appendix 5	Implementation problems	Text changed.
Appendix 6	LBA	57	add "EASA Form Fourteen"		Text changed.
Appendix 6	LFV, Sweden	105	"EASA Form 14" is missing on the form itself.		Text changed.

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Appendix 6	Manfred Bialonczyk, BMVIT	081	The name of the Form " EASA Form 14 " should be added in the bottom of the Form.	There is no name of the Form Appendix 6. This is not in line with M.B.703 (a).	Text changed.
Appendix 6	Martin Ambrose, ERA	079	The columns 1 and 3 on the table at the foot of the certificate need their widths expanding to accommodate the text, or the text size reducing to fit the column.		Formatting change.
Appendix 7	CAA UK	123	In (1), remove wording ..(other than the repair of a straight tubular member by adding an external reinforcing sleeve)..		Text changed.
Appendix 7	CAA UK	123	From item (n), delete the words '..excluding the replacement of seat rails.' From item (o) delete the words '..for transport category aircraft..)		Text changed.
Appendix 7	DGAC, France	162	(1) The modification, repair or replacement by riveting, bonding, laminating, or welding (other than the repair of a straight tubular member by adding an external reinforcing sleeve), or the making of any of the following airframe parts: (a) a box beam; (b) a wing stringer or chord member; (c) a spar; (d) a spar flange; (e) a member of a truss-type beam; (f) the web of a beam; (g) a keel or chine member of a flying boat hull or a float; (h) a corrugated sheet compression member in a wing or tail surface; (i) a wing main rib; (j) a wing or tail surface brace strut; (k) an engine mount; (l) a fuselage longeron or frame; (m) a member of a side truss, horizontal truss or bulkhead; (n) a seat support brace or bracket, excluding the replacement of seat rails; (o) a seat rail replacement for transport category aircraft; (p) a landing gear strut or brace strut; (q) an axle; (r) a wheel; and (s) a ski or ski pedestal, excluding the replacement of a low-friction coating.	We have never considered the making of those parts as maintenance.	Text changed.
Appendix 7	Jean-Francois Suquet, Eurocopter	004	The complex maintenance tasks described in Appendix 7 are focused on fixed wing aircraft. They don't cover the helicopter specificity.		After review it was found that most of these tasks could apply to both fixed and rotary wing aircraft. As no new proposals were made, the text was not changed. If such tasks are later found to be missing, the Agency would amend this Part. No text change.

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Appendix 8	AOPA	141	<p>Modification of the Appendice 8 (Limited Pilot Owner Maintenance) the following text :</p> <p>The following constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex assembly operations and that the owner has appropriate manual</p> <p>(21) Replacing any hose connection except hydraulic connections when pressurised by hydraulic pump.</p> <p>(32) Removal, installation of components such as propeller, magneto in order to send to an organisation for overhaul, repair modification or for access to other component</p> <p>(33) Perform Mass and balance</p>	<p><i>Cost of maintenance increase if some basic operations (see 32 & 33) cannot be performed by the owner.</i></p> <p>(21) There is no difference with (22) if low pressure hoses concerned</p> <p>(32) Such component are easy to remove and install on small aircraft and the fact that removing such component ground the airplane may considerably complicate the task and increase the cost if no workshop available beside (ex: some propeller workshop have not permission to install or remove propeller so in that case you would have to use two different station and you can't have competition)</p> <p>(33) The comprehension of the task is easy for pilot involve in maintenance tasks and using appropriate manual and tools.</p> <p>(34) It's seem to be impossible to predict all tasks according the variety of airplane production and the future production. That open many doors for pragmatics solutions and future technology</p>	<p>1. Text changed.</p> <p>2. Paragraph 21 and 22 are different -21 refers to changing the "connections" of hoses and 22 refers to hoses themselves.</p> <p>3. It is not considered that magneto and propeller removal and mass and balance are items that constitute minor pilot maintenance.</p> <p>Text changed but not as proposed.</p>

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Appendix 8	CAA UK	123	<p>We recommend that the following changes be made to the content of Appendix 8:</p> <p>(NEW, DELETED OR CHANGED TEXT SHOWN IN) Italics</p> <p>Appendix 8 Limited Pilot Owner Maintenance The following constitutes the limited pilot maintenance referred to in M.A.803 provided it does not involve complex assembly operations:</p> <ul style="list-style-type: none"> (1) Removal, installation of wheels. (2) Replacing elastic shock absorber cords on landing gear. (3) Delete in toto (4) Delete in toto (5) Replacing defective safety wiring or cotter keys (ADD NEW TEXT) (excluding those in engine, transmission, flight control and rotor systems). (6) Lubrication not requiring disassembly other than removal of non-structural items such as cover plates, cowlings, and fairings. (7) Making simple fabric patches not requiring rib stitching or the removal of structural parts or control surfaces. In the case of balloons, the making of small fabric repairs to envelopes (as defined in, and in accordance with, the balloon manufacturers' instructions) not requiring load tape repair or 		<p>Introduction to Appendix 8 has been modified to cross refer to M.A.403 which requires standards for the activity, among which competence, to be met. Text changed but not as proposed.</p>

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Appendix 8			<p>structure or any operating system such as controls, electrical equipment, etc.</p> <p>(14) Replacing safety belts (ADD NEW TEXT) or safety harnesses</p> <p>(15) Replacing seats or seat parts with replacement parts approved for the aircraft, not involving disassembly of any primary structure or operating system.</p> <p>(16) Delete in toto</p> <p>(17) Replacing bulbs, reflectors, and lenses of position and landing lights.</p> <p>(18) Replacing wheels and skis where no weight and balance computation is involved.</p> <p>(19) Replacing any cowling not requiring removal of the propeller (ADD NEW TEXT), rotors or disconnection of flight controls.</p> <p>(20) Replacing or cleaning spark plugs and setting of spark plug gap clearance.</p> <p>(21) Delete in toto</p> <p>(22) Delete in toto</p> <p>(23) Delete in toto</p> <p>(24) Replacing (DELETE) and servicing batteries.</p> <p>(25) Cleaning of balloon burner pilot and main nozzles in accordance with the balloon manufacturer's instructions.</p> <p>(26) Replacement or adjustment of non-structural standard fasteners incidental to operations.</p> <p>(27) The interchang</p>		

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Appendix 8			<p>(31) Updating self-contained, front instrument panel-mounted Air Traffic Control (ATC) navigational software data bases (excluding those of automatic flight control systems, transponders, and microwave frequency distance measuring equipment (DME)) provided no disassembly of the unit is required and pertinent instructions are provided. Prior to the unit's intended use, an operational check must be performed.</p> <p>ADD NEW PARAGRAPH (32) Replacement of wings and tail surfaces and controls, the attachment of which are designed to provide for assembly immediately before each flight and dismantling after each flight.</p> <p>ADD NEW PARAGRAPH (33) Replacement of main rotor blades that are designed for removal where special tools are not required.</p> <p>ADD NEW PARAGRAPH (34) Replacement of VHF communication equipment, being equipment which is not combined with navigation equipment.</p> <p>ADD NEW PARAGRAPH (35) Replacement of generator fan belts designed for removal where special tools are not required.</p>		Text changed but not as proposed.
Appendix 8	Europe Air Sports	73	<p>Add: (32) for gliders, including self launching motor gliders, rigging and de-rigging the glider (33) for gliders, including self launching motor gliders, removal and replacement of instruments and other removable equipment</p>	<p>The ability of glider pilots to rig and de-rig their gliders needs to be allowed somewhere in the rules and maybe Appendix 8 is the appropriate place. Without this, gliding would cease. Also, a glider pilot must be able to change the instruments and other removable equipment when needed, without reference.</p>	<p>(32) has been added but with more general wording. (33) was already included in the existing text (see (30) for example) but not with the proposed wording. The change was therefore not found necessary. Text changed but not as proposed.</p>

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Appendix 8	Donald Sherritt Transport Canada	179	<p>The first issue relates to Appendix 7 of part M. This appendix is a list of complex work tasks that must be done within an approved maintenance organizations, and was based on input provided by Transport Canada (M&M). However, we note that only the structural elements we provided have been incorporated. The powerplant and systems elements have not been used. We wonder if this was deliberate, or was an accidental omission Issue#2.</p> <p>We also question the principle of allowing an operator to delegate the responsibility for management of maintenance to a third party, and advise against this. However, we recognize that this applies only to European registered aircraft, and to private operations, and as such is outside the scope of our bilateral agreement, and so has no substantive effect on Canada.</p>		<p>Licensed engineers can only work on aircraft, the additional elements in CAR 571.04 are outside his scope.</p> <p>No text change.</p> <p>In general private owner/operators can delegate the tasks for instance when they do not have the competence to carry out themselves. We feel it is safer to have a competent person managing the airworthiness of an aircraft. It is clear the owner does retain responsibility of the airworthiness. Contracting out tasks he/she is not competent to carry out does not change that and Appendix 1 clarifies this sharing of responsibilities</p> <p>No text change.</p>
Appendix 8	Mike Newman, ALAE	009	<p>Paragraphs 30 and 31. Added to these paragraphs must be:- "if the removal and replacement of such panels require special test equipment to prove survivability, then stated panels may not be changed by the pilot/owner.</p>	<p>The modern light aircraft panel covers many functions, some of which do require test equipment to prove them prior to release to service.</p>	<p>Text changed.</p>
Appendix 8	AEI	034	<p>Paragraphs 21, 22,23,29 must have the additional comment. "On completion of the action, checks for leaks, which may require engine running must be carried out by the pilot/owner. Paragraphs 30 and 31. Added to these paragraphs must be: - "If the removal and replacement of such panels require special test equipment to prove survivability, then stated panels may not be changed by the pilot/owner.</p>	<p>Reason for the above is that the modern light aircraft panel covers many functions, some of which do require test equipment to prove them prior to release to service.</p>	<p>Introduction to Appendix 8 has been modified to cross refer to M.A.403 which requires standards for the activity to be met.</p> <p>Text changed but not as proposed.</p>
Appendix 8	Manfred Bialonczyk, BMVIT	081	<p>Appendix 8 to Part-M change in the first sentence "complex assembly operations" to "complex maintenance tasks"</p>	<p>Maintenance tasks as mentioned in Appendix 8 are not always assembly operation and may be out of the scope of the privilege.</p>	<p>Text changed.</p>
Appendix 8	Mike Newman, ALAE	009	<p>Paragraphs 21, 22, 23, 29 must have the additional comment. "On completion of the action, checks for leaks, which may require engine running must be carried out by the pilot/owner.</p>	<p>The modern light aircraft panel covers many functions, some of which do require test equipment to prove them prior to release to service.</p>	<p>Introduction to Appendix 8 has been modified to cross refer to M.A.403 which requires standards for the activity, among which competence, to be met. Text changed but not as proposed.</p>
Appendix 8, 30.	Martin Ambrose, ERA	079	<p>This paragraph contains errors. The phrase "use, and" on the last line should be replaced with "use an"</p>		<p>Text changed.</p>

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General	ENAC, Italy	102	<p><i>"After receiving such a report the Authority must decide if other actions are to be taken on the Certificate of Airworthiness of the aircraft on the base of Part 21 requirements."</i></p> <p>This comment is co-ordinated with the report of an unairworthy condition from a Continuous Managing Organisation.</p> <p>A paragraph should be added to take into consideration the processing of a negative report from a Continuous Airworthiness Managing Organisation.</p>		Clarification of "such a report" is needed. No text change.
General	Europe Air Sports	73	.	As far as EAS can see, there is no issue number or date on the Draft Part M, which does make reference extremely difficult.	This is the only official draft of Part-M. Any other document should not be taken into account. No text change.
General	Manfred Bialonczyk, BMVIT	81	<p>Within the draft of Part-M various terms are used in an inconsistent way. Examples for this are:</p> <ul style="list-style-type: none"> - Part-M, Part-145, Part-66, etc. which are sometimes used with a hyphen and sometimes not. - The term Subpart is sometimes used with a capital letter and sometimes not. - The "approved aircraft maintenance programme" is sometimes referred to as " maintenance programme", "operator's maintenance programme", etc. The same term should be used throughout the document. 		Text changed.
General	P. Doyer, AEI	34	The majority of the draft is acceptable as it closely follows the JAR doctrine that in the main has been accepted as a working model in as much as is covered by regulations concerning commercial transport.		No action. No text change.
General	Pakul Draper, PPL/IR Europe	74	We object to the proposed regulations as they stand.		No text change specifics requested. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
General	Bill Taylor, De Havilland Support	71	We find that we cannot accept the document as it stands. We are a Type Certificate Holder for 15 different types of aircraft, all below 2730kg MTWA. We are, quite frankly, astonished that EASA should ever consider making the stringent maintenance requirements of JAR OPS 1 applicable to light, classic and vintage aircraft below 2,730kg MTWA. There will be an outcry from the light aircraft owners and operators in the UK when they discover what they will have to put up with the maintain their aircraft in two years time. I strongly urge you to reconsider the application of Part M, as it currently stands, to aircraft below 2,730kg MTWA.		Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: ->If the competent authority finds that these aircraft cannot conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply. No text change.
General	Europe Air Sports	73	In adopting measures for the implementation of common essential requirements in the field of airworthiness, the Commission must take care that they reflect the state of the art and the best practices, take account world-wide aircraft experience and scientific progress and allow for immediate reaction to established causes of accidents and serious incidents	EAS propose insertion in Part M Regulation, the text of paragraph (5) of the preamble to The Part 21 Regulation, as it is no less applicable to maintenance as it is to certification.	The is already a requirement in the Basic Regulation. It is therefore not felt necessary to repeat it. No text change.
General	IAAG	158	We feel that some clarification is needed as far as the regulations applicable to the maintenance of light aircraft operated within a FTO. It should be confirmed that ECAR M is applicable, whilst ECAR 145 is clearly not adapted		Part-M is applicable and does not change existing operations rules in as much as it permits in M.A.201(i) the Member State to determine when an approved maintenance organisation is required. No text change.
General	Martinair Holland	89	Whereas redundancy is normally a good thing in aviation safety systems, it should be avoided in aviation safety regulation. Yet, this document has a number of apparent redundancies in it, at least to the eyes of this reader. If they are true redundancies then they should be removed. Examples: M.1 vs M.B. 102 (Why in M. 1 and not integrated in M.B.201 ?) M.A. 201 (f) vs (i)(1) M.A. 301 item 5 vs 303 M.A. 301 item 6 vs 304 (they may be combined) M.A. 305(b) vs 306 (is aircraft logbook similar to the operator's technical log ? If not, then perhaps rephrase « aircraft logbook » to include other forms of keeping records than a book) M.A. 402 vs 302 (maintenance data form part of maintenance programme)		In some cases, there have been some redundancies but in others the issues addressed are quite different. Text changed but not as requested.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			There are also redundancies with other documents, notably M.A. 202 vs CS 20-8.		
General	Martinair Holland	89	Some paragraphs address the owner of an aircraft, other the operator and yet other both. The distinction appears to be not consistent, as in some paragraphs addressing the owner it is quite clear that also the operator is meant, and v.v. In many cases, an aircraft is owned by a person (such as a tycoon) or an organisation (such as a bank) not at all involved in the day-to-day operation or maintenance. That responsibility then rests with some other person or organisation. To solve this, the requirements now addressed to « owner » or « operator » should be linked to the person or organisation listed on the Certificate of Registration, although that, too, may not always refer to the proper person or organisation in this respect. The Chicago Convention (art. 21) uses two phrases in this respect: "ownership" and "control of the aircraft". It is therefore suggested that all references to owner or operator are replaced by « holder » and that an introductory paragraph be added introducing the concept of holdership, me		This is already dealt with by paragraph M.A.201 where the responsibilities of owners and operators, amongst others, are defined. No text change.
General	Lufthansa AG Germany	21	As a general comment may we request to review the policy to publish Forms as appendices of the rules. It would give the aviation community much more flexibility, if this kind of material would be published in the AMC material. Reacting on new demands would be easier and shorten the revision cycle. As an example the different JAA Form 1 issues may be considered. Also the use of digital formats to exchange data between industry and competent authorities may be hindered if formats are requested by a rule.		Some forms need to be enforceable so as to permit communication throughout the EU especially as there are different languages. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
General	Lufthansa AG Germany	21	The term "owner" should be replaced by "operator" or "legal owner" since there may be parties involved as owner which are not part of the aeronautical community (leasing companies).		Owner/operator accountabilities have been established by ICAO and used consistently throughout this Part. Furthermore, this is dealt with by paragraph M.A.201 where the responsibilities of owners and operators, amongst others, are defined. No text change.
General	Harry Schoevers Europe Air Sports	73	see EAS document S3042A????		Document could not be found. No text change.
General	Martinair Holland	89	The title of this Part is ambiguous, as it addresses more than only maintenance. We do not challenge the definition of maintenance, as contained in M.A. 401. However, this Part also contains regulations for continuing airworthiness management, pre-flight inspections, technical log, which all fall outside the definition of maintenance but are within the concept of continuing airworthiness. Suggest therefore to re-name Part M as: Part CA - Continuing Airworthiness Subpart C may then be renamed Continuing Airworthiness Management.		This Part is called M due to historical reasons in the same manner as 145, 66,147 and 21 have maintained their nomenclature . No text change.
General	Martinair Holland	61	EASA-Form One and ECAR M-F companies. Consider to not use EASA-Form One but a EASA-Form (other new number) for the certificate of release to service by ECAR M-F. This creates a more clear noticeable difference between ECAR 145 and ECAR M-F parts release to service certificates.		A JAA Form 1 is already widely used by non JAR 145 organisations, this precedent has been maintained. No text change.
General	Martinair Holland	61	What is it going to be? IR, CS, ECAR, Part all are / where used. Use one term for all regulations, this keeps it clear.		Part. No text change
General	IVW, The Netherlands	99	CAA-NL Suggests to harmonise the helicopter limits for Light aircraft for part 66 and Large aircraft for Part M. The relative small gap or overlap in these limits might create problems for Part M subpart F AMO's, to get the proper certifying staff, and might initiate non-conformances in this section of maintenance as licence holders or organisations might accidentally work outside their limits.		These limits have been harmonised. Text changed in the proposed Regulation.
General	RAES	107	We observe that the proposals will have a significant impact on General Aviation, but that the extension of the JAR regulations to aircraft with a take off mass of under 5700kg has always been planned in any event and this is a logical development in that light.		No action required. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
General	Baines Simmons Limited		Throughout the whole document the requirements relating to personnel refer to knowledge, qualifications and experience. These aspects do not ensure an individual's ability to satisfactorily complete their function in the organisation (they do however contribute). Competence in Human Factors and Human Performance should also be required for all staff that may have an impact on Maintenance management and completion. Suggested text: Replace all references to "relevant knowledge and appropriate experience" with: All personnel shall be competent to complete their function within the organisation. In addition to the necessary expertise related to the job function, competence must include an understanding of the application of Human Factors and Human Performance issues appropriate to that person's function in the organisation.		This subject is already covered in the basic license requirement for staff certifying outside the Part-145 environment for which there is already a module on the subject. No text change.
General	Jim Gibbons, KLM Engineering	130	Have NAA leaflets been reviewed and incorporated into ECAR's as ECAR M does not state it is acceptable to contract out Aircraft Technical Services, ie maintenance programme control, currently this acceptable practice Mandatory Occurrence Reporting, It is not clear as to whom these reports will be sent ie Local NAA or a central ECAR's group.		JAA TGL 34 has been incorporated into Part-M and all leaflets were reviewed and included as deemed necessary. No change.
General	Ralph Schütte, Lufthansa Germany	150	The term "owner" should be replaced by "operator" or "legal owner" since there may be parties involved as owner which are not part of the aeronautical community (leasing companies).		Owner/operator accountabilities have been established by ICAO and used consistently throughout this Part. No change.
General	Ralph Schütte, Lufthansa Germany	25	The term "owner" should be replaced by "operator" or "legal owner" since there may be parties involved as owner which are not part of the aeronautical community (leasing companies).		Owner/operator accountabilities have been established by ICAO and used consistently throughout this Part. Furthermore, this is dealt with by paragraph M.A.201 where the responsibilities of owners and operators, amongst others, are defined. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M A.202 (a)	Alain Baron, Turbomeca	006	Accountable persons or organisations should ensure that the Aircraft and Engine Type Certificate Holders receive adequate reports of occurrences for that aircraft/engine type, to enable them to issue appropriate service instructions and recommendations to all owners or operators. Liaison with the Aircraft Type Certificate Holder is recommended to establish whether published or proposed service information will resolve the problem or to obtain a solution to a particular problem. An approved continuing airworthiness management or maintenance organisation should assign responsibility for co-ordinating action on airworthiness occurrences and for initiating any necessary further investigation and follow-up activity to a suitably qualified senior person with clearly defined authority and status. In respect of maintenance, reporting a condition that could seriously hazard the aircraft is normally limited to: Serious cracks, permanent deformation, burning or serious corrosion of structure found during scheduled maint		Whilst the concern is understood, this is a JAR 145 requirement, but it is not deemed appropriate to place such a burden in the rule on this Section of industry. No text change.
M A.202 (b)	Alain Baron, Turbomeca	006	On a form and in a manner acceptable to the Member State means that the report may be transmitted by any method acceptable to the Member State i.e. electronically, by post or by facsimile. Each report should contain at least the following information: - Reporter or organisations name and approval reference if applicable. - Information necessary to identify the subject aircraft, engine and or component. - Date and time relative to any life or overhaul limitation in terms of flying hours/cycles/landings etc. as appropriate. - Details of the Occurrence	Reason for the change is that engine type certificate holders need to be informed of the identified conditions that could hazard the engine (engine types are certified separately of the aircraft types).	This text is in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.1	DGAC, France	162	<p>With the inclusion of operational requirements together with the requirements on validity of the Certificate of Airworthiness, Part M mixes responsibilities of the State of Registry and of the State of the Operator. Trying to resolve the problem in a single definition of the Competent Authority may not be the most appropriate way. A clear reference in the core of the text to one State of the other may be more effective.</p> <p>Here are some examples of confusion which may come from this article :</p> <p>In paragraph 1 responsibility is given to the State of Registry for the continuing airworthiness of individual aircraft, this could be understood as including the management of continuing airworthiness.</p> <p>In paragraph 4.ii, responsibility is given to a competent authority agreed by the Member State of Registry and Member State of the operator, this concept of one authority agreed by the Member State of the operator and the Member State of registry is new. Today, the maintenance programme is reviewed by the State of the opera</p>	<i>Implementation problem</i>	<p>Paragraph 4i covers ICAO compliance. Paragraph 4ii is intended to cover existing arrangements between Member States. Therefore there does not seem to be any incompatibility between ICAO and Part-M and today's system is permitted to continue. Disseminating the role of the competent authorities in the text has been commented in the past as creating confusion. No text change.</p>
M.1 (2) (ii)	Martin Ambrose, ERA	079	Can the Agency advise how many organisations will need to be overseen by the Agency to discharge it's obligation under this paragraph.		<p>This has still to be established on this subject. No text change.</p>
M.1 (3) (i)	Loganair Glasgow	96	Clarification required: ie If a UK based sub part G organisation is supporting a foreign AOC, do UK (CAA) rules / requirements apply?		<p>A Subpart G cannot support another operator under its approval. An operator must be itself approve to Subpart G. The operator may subcontract activities under its own approval. No text change.</p>
M.1 (4) (ii)	LBA	57	A procedure in order to solve conflicts between State of registry and State of the operator should be established.		<p>In case of conflicts, ICAO applies and therefore for maintenance programs the state of registry decides. No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.101	Europe Air Sports	73	This part establishes the measures to be taken to ensure that <u>airworthiness in respect of aircraft covered by Article 3 of Regulation 21 (as amended in this response)</u> is maintained, including maintenance. It also specifies the conditions to be met by the persons or organisations involved in such continuing oversight.	<p>EAS is of the opinion that Part M has been drafted mainly with large aircraft (as defined by Article 2(e)) in mind. Many of the provisions would be entirely inappropriate to light aircraft and air sport aircraft maintenance. The provisions do not take fully into account the best practices, as required by the preamble to the draft Regulation, and already well-established in most if not all EU Member States, and operating in a variety of frameworks, both regulated and non-regulated.</p> <p>What really is required is a separate set of maintenance rules specific to the light aircraft category (and which could be for aircraft below 2000 kgs, and balloons), which embraces the current best practices and provides a far less prescriptive framework. In the absence of such separate proposals at this stage, EAS has recommended in the section responding to the main regulation articles for Part M, a derogation for aircraft up to 2000 kgs, and applicability of national rules.</p> <p>The comments below are provided only in the event t</p>	<p>The regulation defines large aircraft. This has been done as the continuing airworthiness requirements for light aircraft are much less stringent. They correspond to the minimum requirements set forth by ICAO:</p> <ul style="list-style-type: none"> - The Subpart G organisation is not compulsory for the management of aircraft and replaces the competent authority for the airworthiness review. - The Subpart F organisation is not compulsory except for components. <p>A simple aircraft can according to Part-M be maintained by a licensed engineer with tools, facilities and data which do not have to be individually owned.</p> <p>The competent authority is designated by the member state according to M1. A Member State may nominate an NGB or an other organisation as the competent authority for certain aircraft.</p> <p>No text change.</p>
M.A.101	Martin Ambrose, ERA	079	This paragraph contains a spelling error. "mesures" should be replaced with "measures".		Text changed
M.A.101	Martin Ambrose, ERA	079	This paragraph contains grammatical errors that would be corrected by placing a full stop between the words "maintenance" and "it" on line 2.		Text changed

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.101	Martinair Holland	089	<p>This paragraph is the scope text. It is ambiguous in several respects:</p> <ul style="list-style-type: none"> - It refers to "this Part". If that is intended it should be lifted out of Section A and put at a level covering both Sections A and B. If it is intended to be limited to Section A only, it should read "This section" (as is the case in M.B. 101). - What is meant by "continuing oversight"? Is that a synonym for continuing airworthiness? Its intention in this context is not the same as defined in 1592, Article 3! - Semantically, the single sentence should be split into two sentences. <p>The text of the explanatory notes is much better. Also the definiton paragraph of 1592, the title of the draft Regulation and of the Draft Opinion form a good source of inspiration for improvement of this subparagraph, which could be altered in e.g.: This section establishes the technical requirements for the continuing airworthiness of aeronautical products, parts and appliances, including maintenance, and for qualified entities involved in the related tasks.</p>		Text changed
M.A.201	Europe Air Sports	73		<p>para (e): The requirement to use a "Continuing Airworthiness Management Organisation" (i.a.w. subpart G) to maintain airworthiness for gliders and light aircraft is a significantly increased organisational and financial burden, for little or probably no gain in safety, and is strongly opposed. This is a view held by the majority of gliding federations in Europe, and this objection has been raised repeatedly by Europe Air Sports (<i>Norwegian Gliding</i>).</p> <p>For the regulation to remain workable for sport aviation, the Maintenance Organisations mentioned in subparts F and G may be a NAC or NGB, in which case the maintenance organisation that has already been established by several NGBs can be continued following adaptation, where applicable, to the proposed Part M. This has been tabled and agreed at meetings with the Core Group, but this required formal clarification in the draft implementing rules.</p>	<p>The use of a "Continuing Airworthiness Management Organisation" is an option given to aircraft owners. They may chose not to use them if they find them too burdensome.</p> <p>There is no provision on the legal structure of an approved organisation. They may be associations</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201	DGAC, France	162	in paragraphs (e) and (f), add “approved” before “continuing airworthiness management organisation” amend paragraph (h), the words “for the aircraft it operates” included in paragraph 1 should be transferred at the end of the introductory paragraph (h), after “shall”	<u>Editorial:</u> Responsibilities can only be given to approved organisations. Paragraph 2 and 3 are also applicable to the aircraft operated. As written, word to word reading of paragraph 2 could mean that the operator could get a 145 approval only for part of the aircraft operated and be compliant	Text changed.
M.A.201	Mr Cartry	173	We place this comment in the case of light aircraft, under 2 tons. The responsibilities of the airworthiness are placed under 3 entities: -The owner, -The organisation performing maintenance, -The continuing airworthiness organisation. The last one will issue a permit of flight in which it will certify that the aircraft is good for flight. This organisation has not performed the maintenance. How it can certify that all is right ? It seems it would be easier for the continuing airworthiness organisation to limit its scope in the quality insurance and not to verify the work of the mechanics. This last one is certified by the maintenance organisation which issues a certificate.		The owner may contract a Subpart G organisation to carry out management tasks for which the organisation becomes responsible. The maintenance organisation carries out the maintenance ordered for which it is responsible. In this case the owner is responsible for bringing his aircraft in for maintenance. The responsibilities are shared. Appendix 1 details all these responsibilities. No text change.
M.A.201	Danish Soaring Association	180	Paragraph (e): The requirement to use a “Continuing Airworthiness Management Organisation” (i.a.w. subpart G) to maintain airworthiness for gliders is a significantly increased organisational and financial burden, for little gain in safety, and is strongly opposed. This is a view held by the majority of gliding federations in Europe, and this objection has been raised repeatedly through Europe Air Sports.		The use of a “Continuing Airworthiness Management Organisation” is an option given to aircraft owners. They may choose not to use them if they find them too burdensome. There is no provision on the legal structure of an approved organisation. They may be associations. No text change.
M.A.201	CAA, Latvia	112	For non-commercial air transport, there is no statement who may carry out maintenance (Only certifying staff for CRS- unclear whether the certifying staff can carry out maintenance itself). Should be some similarity with Subparagraph (g) for commercial air transport.		Anyone can perform maintenance as long as the work executed in compliance with Part-M. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201	Michael Loges, Rolls-Royce, Germany	062	The operator is responsible for the airworthiness of an aircraft (ICAO recommendation) and he may also be the owner. Change owner into operator and delete (b).		Owner/operator accountabilities have been established by ICAO and used consistently throughout this Part. An operator is only accountable in the case of commercial air transport. No text change.
M.A.201	Fédération Française de vol en voile	026	We place this comment in the case of light aircraft, under 2 tons. The responsibilities of the airworthiness are placed under 3 entities: The owner, The organisation performing maintenance, The continuing airworthiness organisation. The last one will issue a permit of flight in which it will certify that the aircraft is good for flight. This organisation has not performed the maintenance organisation which issues a certificate.	The continuing airworthiness organization will need an insurance cover for its activity. The maintenance organization will need also the come cover, We will assist to an inflation on the cost of the maintenance of the light aircrafts.	The owner may contract a Subpart G organisation to carry out management tasks for which the organisation becomes responsible. The maintenance organisation carries out the maintenance ordered for which it is responsible. In this case the owner is responsible to bring his aircraft in for maintenance. The responsibilities are shared. No text change.
M.A.201	Hugo Spruyt Belgian Civil Aviation Authority	016	Airworthiness flight test A flight test shall be performed in circumstances defined by the competent authority.	This proposal of regulation doesn't take the flight test into account. However, as it's explained in Annex I (§1 & 2) of the European Regulation 1592/2002 and by the ICAO (Airworthiness Manual Vol I, §5.2.2.2), it will be necessary to develop this concept in this last proposal of regulation. Indeed, as it is explained by ICAO, a flight test should be required in at least three circumstances: an issuance of a certificate of airworthiness, a renewal of a certificate of airworthiness and for the approval of a modification.	Maintenance check flights are addressed in the rule but in M.A.301. Text changed but not as requested.
M.A.201	Fédération Française de vol en voile	039	We place this comment in the case of light aircraft, under 2 tons. The responsibilities of the airworthiness are placed under 3 entities: -The owner, -The organisation performing maintenance, -The continuing airworthiness organisation. The last one will issue a permit of flight in which it will certify that the aircraft is good for flight. This organisation has not performed the maintenance. How it can certify that all is right ? It seems it would be easier for the continuing airworthiness organisation to limit its scope in the quality insurance and not to verify the work of the mechanics. This last one is certified by the maintenance organisation which issues a certificate.	The continuing airworthiness organisation will need an insurance cover for its activity. The maintenance organisation will need also the same cover. We will assist to an inflation on the cost of the maintenance of the light aircrafts.	The owner may contract a Subpart G organisation to carry out management tasks for which the organisation becomes responsible. The maintenance organisation carries out the maintenance ordered for which it is responsible. In this case the owner is responsible to bring his aircraft in for maintenance. The responsibilities are shared. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201	Martinair Holland	089	M.A. 606(a) defines Accountable Manager as the person “who has corporate authority for ensuring that all maintenance required by the customer can be financed and carried out to the standard required by this Part.” (ECAR-145 contains a similar definition, but that applies to that Part) M.A. 706(a) defines Accountable Manager as the person “who has corporate authority for ensuring that all continuing airworthiness management activities can be financed and carried out in accordance with this Part”. The use of the same function name for two different purposes is confusing, even more so as both refer to the whole Part (i.e. ECAR-M, Section A) and not to the individual Subparts. Furthermore, it is not clear what the difference in accountability is between the Accountable Manager as per 706(a) and the nominated post holder as per 706(d). Both are accountable for all continuing airworthiness management activities, and only those, suggesting their area of accountability is limited to Subpart G. If it is intended to ma		AMC clarifies the relation between the different accountable managers in the different Parts and Subparts. No text change.
M.A.201 (a)	LBA	57	Suggest a different wording as follows “...continuing airworthiness of an aircraft as specified in Part M, Section A, Subpart C and shall ensure ...” to reduce the possibility of disorientation of the use of the regulation.		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (a)	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> - Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; - Operational directive (M.A. 301, item 5); - Mass and balance report (M.A. 305(d); 710(a) 9); - Aircraft to comply with approved AFM (M.A. 710(c)) (It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft) - Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airworthiness. <p>Missing:</p> <ul style="list-style-type: none"> - Defect deferral. M.A. 301 (and M.A. 404, if retained, other comment) should be expand 		<p>These are existing JAR OPS requirements and are covered by the ICAO requirements for continuing airworthiness.</p> <p>No text change.</p>
M.A.201 (a) (2)	LBA	57	“... or clearly identified as unserviceable in accordance with approved documentation (e.g. MEL/CDL), and...”		Not all aircraft have an MEL or CDL-this is a transposition of the ICAO requirement. No change.
M.A.201 (b)	AEA Brussels	020	Aircraft lease: this item needs clarification because the text is referring only to a financial lease, not a dry- or wet-lease.		This is ICAO text and refers to all leases. No text change.
M.A.201 (b)	Warner van der Veer-Jehee, KLM Fleet Services	017	This item needs clarification because this concerns a financial lease and not a wet lease in or out.		This is ICAO text and refers to all leases. No text change.
M.A.201 (b)	Loganair Glasgow	96	Terminology change - alternates between owner and operator. Are they classed as same?		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (c)	Martin Ambrose, ERA	079	This paragraph states that an “person or organisation” is responsible for the tasks performed. If the maintenance is performed by an organisation, can the Agency advise if this paragraph means that the individual within the organisation is ultimately responsible? Furthermore we felt that the word “tasks” should be replaced by the word “maintenance”.		This is a shared responsibility between the organisation and its staff. In case of a problem, only courts can define who has what share of responsibility. This cannot be regulated. Finally, the person in an organisation can only be responsible for the tasks carried out. The combination of tasks build up to make maintenance. No text change.
M.A.201 (d)	ENAC, Italy	102	<i>The pilot-in-command shall be responsible for the satisfactory accomplishment of the preflight inspection. This inspection need not be carried out by an approved maintenance organisation or by Part 66 certifying staff (persons who release aircraft or components to service), <u>but must be carried out by the pilot in command or other appropriately qualified staff.</u> The requirement regarding preflight inspections that in JAR is addressed in different way in JAR OPS Subpart M. In many cases the actual execution of the inspection is partially or totally done by qualified staff (either ground staff or crewmembers).</i>		Text changed.
M.A.201 (d)	AEA Brussels	020	“The pilot in command shall be responsible for the satisfactory accomplishment of the pre-flight inspection...”. We do not agree. The operator is responsible for the performance of the pre-flight inspection and the <u>task</u> of the pre-flight inspection can be delegated to the pilot-in-command, Part 66 staff, Part 145 organisation or to whomever the operator has contracted out the tasks.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (d)	Alain Picard, AECMA	045	<p>We are quite satisfied with the way the regulation is written: it is clear per MA301 that the preflight inspection participates in the continuing airworthiness and that we can take advantage of it when designing the maintenance program per MSG3 methods. It is also clearly stated that the preflight inspection is not necessarily carried out by a certified mechanic and need not be recorded in the aircraft maintenance log-book. On the other hand these statements are currently very disputed with the FAA who does not recognize the preflight inspection as a normal pilot duty to be taken into account in the MSG3 analysis. We are anxiously waiting for thr harmonization groups meetings which shall review these very diverging interpretations.</p> <p>Supporting data: MA 201 (d) The pilot-in-command shall be responsible for the satisfactory accomplishment of the pre-flight inspection. This inspection need not be carried out by an approved maintenance organization or by Part 66 certifying staff (persons who release aircraft or c</p>		Point noted. This issue should be addressed by EASA. No text change.
M.A.201 (d)	Warner van der Veer-Jehee, KLM Fleet Services	017	<p>In JAR-OPS this is an Operator responsibility, how could a Pilot fill in this responsibility. (In KLM ICA fleet a ground engineer performs the pre-flight inspection)</p>		Text changed.
M.A.201 (e)	Hugo Spruyt Belgian Civil Aviation Authority	016	<p>The requirement M.A.201 should be changed as follows: In order to satisfy the responsibilities of paragraph (a) the owner of an aircraft shall contract the tasks associated with continuing airworthiness to a continuing airworthiness management organisation as specified in M.A. Subpart G (continuing airworthiness management organisation hereinafter) in accordance with Appendix 1. In this case, the continuing airworthiness management organisation assumes responsibility for the proper accomplishment of these tasks</p>	<p>The possibility to deliberately perform the maintenance of an aircraft in a non-controlled environment, imposes an extra burden on the authority and does not enhance safety. Furthermore, there is normally no possibility to obtain an ARC without the recommendation of a subpart-G organisation. So, why not contract with a subpart-G from the very beginning? The Belgian Civil Aviation Authority estimates that private aircraft owners should not have the choice to maintain their aircraft in a non-controlled environment.</p>	<p>This is a common existing practice in certain Member States which have adequate safety records to allow the aircraft owners to carry out the continuing airworthiness of their aircraft and even in some cases the release to service. Part-M has limited itself to the recommendations of ICAO. No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (e)	H.T. Beekelaar, Martinair	008	G1 approved operator: Presently in the Netherlands a JAR 145 approved company will do the Renewal C of A inspection. According (h)-2 this must be the operator. How to deal with this?		Today Dutch practice is associated with extra privileges given according to national rules that could be assimilated to Subpart G, as today JAR 145 does not give the privilege to renew C of As. This is also the case with Part-145. An extra Subpart G approval should be obtained. Finally, for CAT, the operator is managing the aircraft. If another entity issues a recommendation, it can no longer be extended. No text change.
M.A.201 (e)	ENAC, Italy	102	The contracted organisation may retain responsibilities for a subset only of the responsibilities listed in M.A.201(a). In fact the discharging of responsibilities listed in items (b)(2) and (b)(3) is based upon the correct reporting of failures to the maintenance organisation. The obligations of the owner and the organisation are reported in Appendix 1 as a part of the contract. ENAC believes that those obligations, which are essential in discharging the Responsibilities listed in M.A.201, should be placed in an Appendix to the rule separate from the contract specimen, because are rule material because the contract/arrangement with a continuous airworthiness management organisation is mandated by Part M. Therefore in case of non compliance with the obligation, the involved are breaking the law, rather than breaking a commercial contract.		Appendix 1 has been changed and is no longer a contract but contains key points for the sharing of responsibilities for the agreement. Text changed.
M.A.201 (e)	H.T. Beekelaar, Martinair	008	G1 approved operator: Presently in the Netherlands a JAR 145 approved company will do the Renewal C of A inspection. According (h)-2 this must be the operator. How to deal with this?		Today Dutch practice is associated with extra privileges given according to national rules that could be assimilated to Subpart G, as today JAR 145 does not give the privilege to renew C of As. This is also the case with Part-145. An extra Subpart G approval should be obtained. Finally, for CAT, the operator is managing the aircraft. Another entity can issue a recommendation for the issue of an ARC but in this case the ARC can no longer be extended to 3 years. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (f)	ENAC, Italy	102	<i>(f) In the case of large aircraft, in order to satisfy the responsibilities of paragraph (a) the owner of an aircraft shall ensure that the tasks associated with continuing airworthiness are performed by a continuing airworthiness management organisation. #drawn up, the The contract shall be made in accordance with Appendix 1. In this case, the continuing airworthiness management organisation assumes responsibility for the proper accomplishment of these tasks. In M.A. 201, point "f", the words "if drawn up" should be deleted otherwise operator of large aircraft have no obligation to contract tasks associated with continuing airworthiness so they are performed by a continuing airworthiness management organisation. ENAC strongly opposes that such tasks could be informally delegated to those organisations without a written agreement.</i>		Text changed.
M.A.201 (f)	Loganair Glasgow	96	Confirmation required of the terminology 'large aircraft'		Defined in the draft Regulation.
M.A.201 (f)	Michael Loges, Rolls-Royce, Germany	062	The continuing airworthiness management organization is generated without consultation of the involved parties and will impose an additional financial burden to the operators and will bring commercial disadvantages compared to operators eg. under FAR 121. Further i.a.w. ICAO recommendations the airworthiness review is a task of the country of registration and the EU does not register aircraft.		For General Aviation Subpart G is not compulsory so does not incur any additional financial burden for this sector. For commercial air transport this is a transposition of JAR OPS Subpart M. This rule is intended to apply to the European Union, and the Member States adopt and implement the rule for aircraft on their registers as specified in Regulation (EC) 1592/2002. No text change.
M.A.201 (f)	CAA UK	123	Amend content of second sentence to read 'A written contract is required in accordance with Appendix 1.'		Text changed.
M.A.201 (g)	H.T. Beekelaar, Martinair	008	No statement about American/Canadian companies only ECAR 145 approved MRO's		US and Canadian scenarios for maintenance are dealt with via bilateral agreements which are concluded outside this Part (See similar comments on this issue in the regulation CRD). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (g)	DAC Luxembourg	129	Nothing exists in the EASA documents concerning the maintenance of private aircraft registered in an EU member state and permanently maintained outside of the EU.		Article 4 of the Basic Regulation determines, whether or not Part-M is applicable to an aircraft when it is operated abroad, outside the EU. No text change.
M.A.201 (h)	ENAC, Italy	102	<i>(h) In the case of commercial air transport (operations carried out under an operating license and an air operator certificate according to Council Regulation (CEE) N° 2407/92 of 23 July 1992), the operator is responsible for the continuing airworthiness of an aircraft and shall: Delete the reference to the Council Regulation because it applies only to intra-UE flights. Commercial Air Transport is defined in JAR 1: Commercial Air Transportation' means the transportation by air of passengers, cargo or mail for remuneration or hire. Whatever the definition adopted, it has to be placed among other definitions (for example in the Article 2 of Maintenance Regulation Draft)</i>		The definition as prescribed in regulation 2407/92 is the definitive text to be used. Nonetheless, paragraph M.A.201(i) allows each Member State to expand this definition according to its national operational rules. The situation is unchanged from today. No text change.
M.A.201 (h)	Martinair Holland	089	The current text of M.A. 201(h) is ambiguous in that it makes unclear whether or not contracting of Continuing Airworthiness tasks (as allowed by M.A. 201(e) for "owners") is also allowed for operators. Currently, it is, as per Maintenance-TGL 34.		This subject is dealt with in Subpart G and AMC has been developed based upon TGL 34. This paragraph only deals with accountability and the operator is always accountable for the continuing airworthiness of the aircraft it operates, including the tasks associated with the management of the continuing airworthiness. This responsibility cannot be subcontracted. This was already the case in TGL 34. No text change.
M.A.201 (h) (1)	Loganair Glasgow	96	Does this mean that an organisation approved to sub-part G cannot stand alone: ie it must exist with an operator having an AOC - this applying to commercial transport operations		There can be stand alone Subpart G approved organisation, but, in the case of CAT, they cannot be approved for the management of the aircraft unless they are also the operator for the aircraft managed. No text change.
M.A.201 (h) (1)	Ralph Schütte, Lufthansa Germany	025	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates, and;... Add: Notwithstanding M.A.201(H) 1. these tasks may be contracted to another ECAR-M organisation. The ultimate responsibility stays with the operator. He needs to have a core competence in order to be able to control these functions.	Basic principals of TGL 34 should be transferred to allow the Commercial Air Transport Operator to (sub-)contract at least the tasks in the field of Continuing Airworthiness Management onto another Part-M approved organisation but leaving the ultimate responsibility with the operator. Remark: see alternative proposal	This is dealt with in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (h) (1)	Lufthansa AG Germany	021	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates, and;... Add: Notwithstanding M.A.201 (H) 1. these tasks may be contracted to another Part-M organisation. The ultimate responsibility stays with the operator. He needs to have a core competence in order to be able to control these functions. Argument: Basic principals of TGL 34 should be transferred to allow the Commercial Air Transport Operator to (sub-)contract at least the tasks in the field of Continuing Airworthiness Management onto another Part-M approved organisation but leaving the ultimate responsibility with the operator. Remark: see alternative proposal		This is dealt with in the AMC. No text change.
M.A.201 (h) (1)	Ralph Schütte, Lufthansa Germany	150	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates or contract such an organisation, and;...	Acceptance of the basic principle to allow (sub-)contracting of tasks onto adequately certified organisations (same principal as for the field of maintenance or as it is followed in M.A.201(i)) From a safety aspect this would be an advantageous possibility, for small or inexperienced start-up airlines. Statistical relevant evaluations in order to develop and control a maintenance program are often not possible for small fleets! Remark: see alternative proposal	This is dealt with in the AMC. No text change.
M.A.201 (h) (1)	Ralph Schütte, Lufthansa Germany	150	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates or contract such an organisation, and;... (H) 1. these tasks may be contracted to another ECAR-M organisation. The ultimate responsibility stays with the operator. He needs to have a core competence in order to be able to control these functions.	Basic principals of TGL 34 should be transferred to allow the Commercial Air Transport Operator to (sub-)contract at least the tasks in the field of Continuing Airworthiness Management onto another Part-M approved organisation but leaving the ultimate responsibility with the operator. Remark: see alternative proposal	This is dealt with in the AMC. No text change.
M.A.201 (h) (1)	Ralph Schütte, Lufthansa Germany	150	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates or contract such an organisation, and;...	Argument: Acceptance of the basic principle to allow (sub-)contracting of tasks onto adequately certified organisations (same principal as for the field of maintenance or as it is followed in M.A.201(i)) From a safety aspect this would be an advantageous possibility, for small or inexperienced start-up airlines. Statistical relevant evaluations in order to develop and control a maintenance program are often not possible for small fleets! Remark: see alternative proposal	This is dealt with in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.201 (h) (1)	Ralph Schütte, Lufthansa Germany	025	...be approved, as part of the air operator certificate issued by the competent authority, pursuant to M.A. Subpart G for the aircraft it operates or contract such an organisation, and;...	Acceptance of the basic principle to allow (sub-)contracting of tasks onto adequately certified organisations (same principal as for the field of maintenance or as it is followed in M.A.201(i)). From a safety aspect this would be an advantageous possibility, for small or inexperienced start-up airlines. Statistical relevant evaluations in order to develop and control a maintenance program are often not possible for small fleets! Remark: see alternative proposal	This is dealt with in the AMC. No text change.
M.A.201 (h) (2)	ENAC, Italy	102	<i>2. be <u>appropriately</u> approved in accordance with Part 145 or contract such an organisation, and; Otherwise a commercial operator that is JAR 145 approved for some types or categories of products could operate a fleet of different types of aircraft without any obligation to contract appropriately approved JAR145 organisations. Note that the word "appropriately" is already used in item 1 and the different wording used in the two requirements is not justified.</i>		Text changed.
M.A.201 (i)	Manfred Bialonczyk, BMVIT	081	Change the text to M.A.201 (i) to read as follows: When an operator is requested by a Member State to hold a certificate for its operational activities, other than for commercial air transport, it shall:		Text changed.
M.A.201(h) (2)	H.T. Beekelaar, Martinair	008	G1 approved operator: Presently in the Netherlands a JAR 145 approved company will do the Renewal C of A inspection. According (h)-2 this must be the operator. How to deal with this?		Today Dutch practice is associated with extra privileges given according to national rules that could be assimilated to Subpart G, as today JAR 145 does not give the privilege to renew C of As. This is also the case with Part-145. An extra Subpart G approval should be obtained. Finally, for CAT, the operator is managing the aircraft. Another entity can issue a recommendation for the issue of an ARC but in this case the ARC can no longer be extended to 3 years. No text change.
M.A.202	Jim Gibbons, KLM Engineering	130	(d) Reports must be made as soon as practicable but in any case within 72 hours of the person or organisation maintaining the aircraft identifying the condition to which the report relates. A copy of the report must be <u>retained in either hard copy or electronic format</u> . Ground occurrence not necessarily aircraft tail specific and		The format of retained data is dealt with in AMC material. Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			therefore could not be retained as part of the airworthiness record for a particular aircraft registration		
M.A.202	Martinair Holland	061	We ask if occurrence reporting should be applicable for the G-1 organisation. If an occurrence is found the Operator is responsible for reporting it according JAR-OPS. Occurrence reporting should be applicable for the ECAR M-F maintenance organisations. We ask you to consider the centralisation of regulations on occurrence reporting in ECAR 20-8 and than require occurrence reporting according ECAR 20-8 in ECAR M, 21, 145 and JAR-OPS.		A Subpart G organisation is also the operator for commercial air transport therefore there is no incompatibility. No text change.
M.A.202	P. Doyer, AEI	034	Nothing to add but we consider this to be a cornerstone of aircraft and component safety. Non compliance should be considered as non compliance to a C of A. It must be part of the competent Authority annual audit.		No text change.
M.A.202	Mike Newman, ALAE	009	Nothing to add but we consider this to be a cornerstone of aircraft and component safety. Non compliance should be considered as non compliance to a C of A. It must be part of the competent authority annual audit.		No text change.
M.A.202	H.T. Beekelaar, Martinair	008	There relations to ECAR 145, IR 21, JAR-OPS (EU-OPS) and GAI-20X8 (CS 20-8) - Is reporting necessary to the G-1 organization? - Murhy's law appears when you have to consult 4 different locations		Occurrence reporting is also a continuing airworthiness issue. JAR-OPS only deals with operational issues, Part-145 with maintenance issues and 21 with airworthiness issues. Now with Part-M all the aspects are covered. Murphy's law also appears when gaps are left in the system. No text change.
M.A.202	Warner van der Veer-Jehee, KLM Fleet Services	017	New in relation to JAR-OPS is that a copy of a reportable occurrence report should be incorporated in the maintenance record system.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.202 (a)	Europe Air Sports	73	Any person or organisation accountable under MA.201 shall report to the State of registry, the organisation responsible for the type design and, if applicable, the Member State of operator, any identified condition of an aircraft or component that could hazard the aircraft.	Mandatory reporting of any hazardous condition is inappropriate and unreasonable for non-commercial recreational light aircraft operators. Current UK law only mandates occurrence reporting for aircraft involved in commercial operations. As the required severity of the fault is not indicated, there is a risk that significant airworthiness information and administration systems will become swamped under a mass of irrelevant detail and trivia. It is impractical to expect a light aircraft owner to report a defect to the organisation responsible for type design as well as to the national authority. It is suggested that the requirements for the reporting system be based on aircraft weights and type of operation (eg, commercial air transport, etc).	This permits ensuring a uniform high level of safety as detailed in Article 2 of Regulation (EC) 1592/2002. This is already required in some member states and removing it would lower the level of safety. No text change.
M.A.202 (a)	ENAC, Italy	102	<i>(a) Any person or organisation accountable under M.A.201 shall report to the State of registry, the organisation responsible for the type design and, if applicable, the Member State of operator, any identified condition of an aircraft or component that could <u>seriously affect hazard</u> the aircraft. The change is needed to be consistent with Part 145 A.60(a) and JAR OPS1.420 (b), otherwise the requirement of reporting to the state of registry could be extended to every technical defect that somehow affect the airworthiness with an undue burden for the operator and the authority .</i>		Text changed.
M.A.202 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	Any person or organisation accountable under M.A.201 shall report to the State of registry, the organisation responsible for the type design or the supplemental type design and, if applicable, the Member State of operator, any identified condition of an aircraft or component that could hazard the aircraft.(b) Reports shall be made in a manner established by the Agency and contain all pertinent information about the condition known to the person or organization accountable under M.A.201.(d) Reports shall be made as soon as practicable, but in any case within seventy-two hours of the person or organisation accountable under M.A.201 identifying the condition to which the report relates. A copy of the report shall be incorporated in the aircraft maintenance record system	For paragraph (a) - We add the reference to the supplemental type design to cover the case of an occurrence that concerns a zone of an aircraft, which was modified by an STC.	Text changed.
M.A.202 (a)	CAA UK	123	Replace the word 'accountable' with 'responsible'		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.202 (b)	LBA	57	Minimum requirements for the reports shall be established by Agency. Additions by state of registry may be allowed in order to facilitate the required aircraft continuing airworthiness monitoring as per M.B.303.		AMC expands on this issue, however there is no requirement for additional national variations. No text change.
M.A.202 (b)	Hugo Spruyt Belgian Civil Aviation Authority	016	Reports shall be made in a manner established by the Agency and contain all pertinent information about the condition known to the person or organisation accountable under M.A.201.	We add the notion of accountable under M.A.201 to be more precise.	It is implicit that these are the subjects dealt with in paragraph (a). No text change.
M.A.202 (d)	Manfred Bialonczyk, BMVIT	081	M.A.202(d) change the end of the sentence: "...Maintenance records according to M.A. 305(b) system,"	Clear reference where this reports should be stored is missing.	Text changed but not as proposed.
M.A.202 (d)	Finnair Oyj Technical Services	072	Paragraph requires the copy of the occurrence report to be incorporated in the aircraft maintenance record system. On the other hand para M.A.305 does not mention the occurrence report nor the required retention time.		Text changed but not as proposed.
M.A.202 (d)	Hugo Spruyt Belgian Civil Aviation Authority	016	Report shall be made as soon as practicable, but in any case within seventy-two hours of the person or organisation accountable under M.A.201 identifying the condition to which the report relates. A copy of the report shall be incorporated in the aircraft maintenance record system.	We add the notion of accountable under M.A.201 to be more precise.	It is implicit that these are the subjects dealt with in paragraph (a). No text change.
M.A.202 (d)	AEA Brussels	020	Occurrence Reporting. "A copy of the report shall be incorporated in the aircraft maintenance record system". No such requirement is presently incorporated in JAR OPS. And secondly, we do not agree. The reporting of occurrences should be via other routes, especially for commercial operators who have a contract with an ECAR 145 approved organisation. ECAR 145 already covers the topic of Occurrence Reporting.		Text changed.
M.A.202 (d)	Europe Air Sports	73	Reports shall be made as soon as practicable, but in any case within five working days of the person or organisation identifying the condition to which the report relates. A copy of the report shall be incorporated in the aircraft maintenance record system.	The seventy-two hour requirement to report occurrences is unacceptable. This does not necessarily give sufficient time to correctly identify the problem, and makes no allowance for weekends or public holidays. Suggest the response time be stated in terms of working days. Again, it is suggested that the requirements for the reporting system be based on aircraft weights and type of operation (eg, commercial air transport, etc).	Existing requirement in the JAA system and most national regulations. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.202 (d)	Aerospace Industries	170	Revise as follows: (d) Reports shall be made as soon as practicable, but in any case within seventy-two hours of the person or organisation accountable under M.A. 201 identifying or receiving report of the condition to which the report relates. A copy of the report shall be incorporated in the aircraft maintenance record system. Comment: This clarifies the situation where a maintenance organization reports findings to the accountable maintenance organization and provides additional time to receive and process such a report.		It is implicit that these are the subjects dealt with in paragraph (a). No text change.
M.A.202 (d)	T. M. Gonzalez, Pratt & Whitney	084	(d) Reports shall be made as soon as practicable, but in any case within seventy-two hours of the person or organisation <u>accountable under M.A. 201 identifying or receiving report</u> of the condition to which the report relates. A copy of the report shall be incorporated in the aircraft maintenance record system. <i>Comment: This clarifies the situation where a maintenance organization reports findings to the accountable maintenance organization and provides additional time to receive and process such a report.</i>		It is implicit that these are the subjects dealt with in paragraph (a). No text change.
M.A.301	DGAC, France	162	"5. the accomplishment of any applicable operational directive, airworthiness directive and any other continued airworthiness requirement established issued or adopted by the Agency and of any safety measures taken by the State of Registry."	Implementation problems 1. There is for the time being no regulation for the establishment of operational directives or continuing airworthiness requirement by the Agency. Until that time operational directives will have to be imposed directly by each Member State (even if that is done on Agency's proposal). 2. For foreign aircraft leased by European operator the applicable AD are those of the State of Registry According article 10.1 of Regulation 1592, Member State can take measures to react to a safety problem.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.301	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> · Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; · Operational directive (M.A. 301, item 5); · Mass and balance report (M.A. 305(d); 710(a) 9); · Aircraft to comply with approved AFM (M.A. 710(c)) (It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft) · Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airworthiness. <p>Missing:</p> <ul style="list-style-type: none"> · Defect deferral. M.A. 301 (and M.A. 404, if retained, other comment) should be expand 		<p>These requirements are either existing are existing JAR OPS/M requirements or covered by the ICAO requirements for continuing airworthiness.</p> <p>No text change.</p>
M.A.301	Martinair Holland	089	<p>According M.A. 404, aircraft defect deferral and rectification is seen as part of maintenance <i>standards</i>. This is questionable. Defect deferral is not part of maintenance (see definition of maintenance), but it is part of continuing airworthiness. Its inclusion in Subpart C (M.A. 301 - item 2) is therefore considered appropriate. For aircraft engaged in commercial air transportation, defect handling requirements should be expanded in this Subpart C by adopting Subpart C of JAR/MMEL/MEL regulations.</p>		<p>The assessment of a defect is a maintenance activity as detailed in maintenance standards M.A.404.</p> <p>No text change.</p>
M.A.301	FAA USA	174	<p>AFS-300 Bill/Leo—are we satisfied with parenthetical definition of “standard”?</p>		<p>Text changed.</p>
M.A.301 (2)	Michael Loges, Rolls-Royce, Germany	062	<p>Manufacturing or design standards are not intended to be used for rectification, they should be done i.a.w. approved maintenance data. Delete: “manufacturing / design /”</p>		<p>Text changed.</p>
M.A.301 (2)	Europe Air Sports	73	,	<p>Industry standard repair methods such as those contained in FAA AC.43.13 should be recognised.</p>	<p>This is addressed in the AMC.</p> <p>No text change.</p>
M.A.301 (4)	Loganair Glasgow	96	<p>What guidance will be issued for analysis of the effectiveness of the maintenance programme?</p>		<p>Clarified in AMC.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.301 (5)	ENAC, Italy	102	<i>5. the accomplishment of any applicable operational directive, airworthiness directive and any other continued airworthiness requirement established by the Agency; Operational directives are operational requirements which, by nature, affect the intended operation of the aircraft rather than its airworthiness. Therefore they cannot be comprised in the continuing Airworthiness of the aeroplane. It is responsibility of the owner or Flight Operations Department of the Operator that an aircraft dispatched for a certain flight complies with the operational directives applicable to that flight. Compliance with operational directives should therefore be specifically required with a separate work order, procedure or whatever else arrangement by the owner /operator. On the other hand it is to be noted that Additional Airworthiness requirements for operations are excluded from the list.</i>		Text changed.
M.A.301 (5)	LBA	57	The Agency should consult all Member States before the list of "continued airworthiness requirement established by the Agency" is fixed. There are different requirements in the Member States which have to be discussed.		The agency will consult according to Regulation (EC) 1592/2002 and its associated rulemaking procedures. No text change.
M.A.301 (5)	Loganair Glasgow	96	Clarification required - What is an operational directive? - Approved Data?		Text changed.
M.A.301 (6)	Warner van der Veer-Jehee, KLM Fleet Services	017	What is Agency approved data in relation to modifications? (point needs clarification before rule becomes effective)		Specified in M.A.304.No change.
M.A.301 (7)	LFV, Sweden	105	The embodiment policy should also include non-mandatory inspections in addition to modifications. Proposed wording : "7. for non-mandatory modifications <u>and/or inspections</u> , for all large..."		Text changed.
M.A.301 (7)	FAA USA	174	What is meant by an "embodiment policy" and how is the owner to comply with this requirement? Suggest further clarity on "embodiment policy" and obligations placed upon the owner.		Text developed in AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302	Richard A. Peri Aircraft Electronics Association	EASA_	<p>The Association does not support the proposed expansion of Part M to aircraft below 5700 kg.</p> <p>The proposed maintenance management imposed by the regulation is not appropriate to privately owned, privately-operated light aircraft with a maxim weight below 5700 kg.</p> <p>General aviation aircraft are maintained in conformance to manufacturer's maintenance programs.</p> <p>The requirement to individually approve each and every aircraft's maintenance program is administratively burdensome to individual National Aviation Authorities; extremely costly to individual owners/operators; and will introduce a lack of standardization essential to the improving safety of general aviation maintenance and operations.</p> <p>The proposed regulation will discourage growth in the ownership of general aviation aircraft. The proposal will channel limited financial resources away from safety enhancing cockpit technology in order to develop maintenance work cards and maintenance management</p>		<p>ICAO annex 6 requires a maintenance program to be approved by the member state. Furthermore the rule does not prevent referral to TC holders/Manufacturers recommendations.</p> <p>No text change.</p>
M.A.302	Pål Pettersen Norway	135	<p>Maintenance Program</p> <p>The operators do not need to make their own inspection sheet as long as this can be copied from a manual. The Member State does not need to approve amendments where the operator follows the recommendation from the TC holders. The operator only send in the amendment to his program to the Member State. Where an operator wishes to follow the TC holders recommendations (and the recommendations of equipment installed) they can make a program according to this, and not make their own inspection sheets for the different inspection.</p> <p>There is no problem to satisfy the regulations in ECAR-M 1.302 (e) with this system.</p>		<p>There must be a link between the manufacturers recommendations and the approved program and this is developed in AMC. Furthermore it is possible to approve amendments through a procedure approved by the authority.</p> <p>No text change.</p>
M.A.302	LBA	57	<p>All changes to JAR-OPS 1 subpart M proposed with NPA-OPS 28 should be transferred to this subparagraph. It is important to have a requirement for the review period of the maintenance program.</p>		<p>Included in AMC.</p> <p>No text change.</p>
M.A.302	Hugo Spruyt Belgian Civil Aviation Authority	016	<p>For the development of the Maintenance Program, it'll be more effective to add a procedure that requires for a given operator, only one maintenance program for all the aircrafts of the same type involved in the same kind of operation. Indeed, this situation will improve the quality of the reliability study. However, this proposal requires some discussion between the different Member States if we have the situation of one operator with one aircraft type but with registrations in different Member States.</p>		<p>This would not be a feasible option considering the current operational restraints.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302 (a)	Europe Air Sports	73	Every aircraft shall be maintained in accordance with a maintenance programme approved by the competent authority, which shall be periodically reviewed and amended accordingly.	<p>It will often be inappropriate for recreational light aircraft owners or light aircraft maintenance organisations to draft maintenance programs for their aircraft.</p> <p>It should be confirmed that pre-existing generic maintenance programs, such as the UK Light Aircraft Maintenance Schedule (LAMS), are satisfactory maintenance programs.</p> <p>It should be recognised that LAMS will not be reviewed by the maintenance organisation. This should be the responsibility of the NAA, in collaboration with maintenance organisations.</p> <p>In a typical NAC or NGB for gliding, if the general maintenance manual for gliders (approved in most cases by the relevant NAA), combined with the manufacturers type-specific maintenance manuals, ADs, service bulletins etc. can be defined as a "maintenance programme", then existing systems in NGBs should provide compliance with this paragraph.</p>	Included in AMC. No text change.
M.A.302 (a)	Martin Ambrose, ERA	079	This paragraph requires that the maintenance programme is approved by the competent authority. Part M.1 defines the competent authority for an EU Member State based operator or maintenance organisation as being the authority designated by the Member State. If this paragraph was applied, this would inevitably lead to national variants. How does the Agency plan to ensure that national variants, one of the fundamental issues that the establishment of EASA is supposed to eliminate, are not allowed to occur?		Maintenance programs will vary dependent upon utilisation, environment and other factors which does inevitably lead to variations for types. There will therefore be differences between programs even within the same country. No text change.
M.A.302 (a)	Michael Loges, Rolls-Royce, Germany	062	To require a maintenance program for every aircraft imposes an undue burden to the General aviation. Every commercial used aircraft ...Non commercial used aircraft shall be maintained i.a.w. the maintenance program/ maintenance instructions of the TC-holder, approved by the type certifying authority. The competent authority of the state of registry or the state of operation may require additional specific requirements /maintenance tasks.		ICAO annex 6 requires a maintenance program to be approved by the member state. Furthermore the rule does not prevent referral to TC holders/Manufacturers recommendations. No text change.
M.A.302 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	Every aircraft shall be maintained in accordance with a maintenance programme approved by the competent authority, which shall be periodically reviewed, at least annually, and amended accordingly.	It should be more adequate to add the notion of a yearly review for the Maintenance Program [as it is explained in the JAR-OPS 1 Subpart M, appendix 1 to AMC OPS 1.910 (a) & (b)]. This notion seems to be adequate to follow the TC Holder's	AMC further defines this subject "at least annually". No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				recommendations. (for example: the MPD of the Boeing is edited every three months).	
M.A.302 (a)	Aircraft Electronics Association	152	Paragraph (a) mandates that every aircraft be maintained in accordance with an approved maintenance program. While this concept is acceptable for fleet managed aircraft the concept is not acceptable for privately owned aircraft. The owner/operator of each individual aircraft will be required to develop, receive approval of, and have their contracted maintenance organization maintain their aircraft to a maintenance program unique only to that aircraft. This concept is logistically unacceptable with respect to the NAA approval and management of these programs; unacceptable with respect to the financial burden placed on the individual aircraft owners; unacceptable with respect to the maintenance organizations required to maintain each light aircraft to its own unique maintenance criteria; and unacceptable with respect to aviation safety. For over 50 years light aircraft have been successfully maintained in accordance with the manufacturer's published criteria. The manufacturer's published maintenance criteria sh		ICAO annex 6 requires a maintenance program to be approved by the member state for each aircraft. Furthermore the rule does not prevent referral to TC holders/Manufacturers recommendations. No text change.
M.A.302 (b)	Benoit Van Noten, Belgian Civil Aviation Authorities	016	Replace paragraph (b) with: The maintenance programme and any subsequent amendments thereof, shall be approved by the competent authority.	The original text as it is, is just obligation put on the authority to approve any maintenance programme and amendments thereof, whatever the quality of the document. It is grammatically equivalent to "the authority shall do this and that". It does not reflect the primary intent, which is that maintenance programmes must be submitted to approval and approved before being used. The proposed text is grammatically equivalent to "the maintenance programme shall be painted in red"; it requests from the maintenance programme to have a quality, which is to be "approved (by somebody)".	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302 (b)	DGAC, France	162	“(b) The competent authority shall approve the maintenance programme and any subsequent its amendments procedure.”	<p>Implementation problems</p> <p>1. Existing text is confusing because paragraph (a) requires an approval of the complete maintenance programme (by the competent authority) and paragraph (c)(3) requires specific additional approval of owners instructions (by the State of Registry !) Basic principles must be : The owner/operator demonstrate compliance with basic manufacturer's instructions and additional instructions from the competent authority If the owner / operator wishes to divert he has to provide justification. Paperwork should be reduced to the essential in order to facilitate the work of the industry and better allocate authority's resources, we consider approving each and every amendment as unnecessary.</p>	Text changed.
M.A.302 (c)	IVW, The Netherlands	99	CAA-NL suggests to include a reference to relevant AD's issued by the agency.		Covered in M.A.302(c) (1). No text change.
M.A.302 (c)	Hugo Spruyt Belgian Civil Aviation Authority	016	The maintenance programme must establish compliance with: 2) Instruction issued by the Member State of registry or by the Member State of the operator if necessary, if they differ from sub-paragraph 1 or in the absence of specific recommendations, or.....	This paragraph should introduce the instructions issued by the Member State of the operator. Indeed, the Member State of the operator has some responsibilities as it is explained in paragraph M.1 [§(ii)]. However, if the State of registry and the State of the operator cannot agree on a suitable delegation or transfer of duties, the lessor or the lessee may endeavour to enter the leased aircraft on the registry of the State of operator, as it is explained by the ICAO (Doc 8335-AN/879, Chap. 10, §10.2.6).	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302 (c)	DGAC, France	162	(c) The owner or the operator shall 1. establish compliance of the maintenance programme with: 1i. instructions for continuing airworthiness issued by type certificate and supplementary type certificate holders and any other organisation required to publish such data by Part 21 and component manufacturers, or 2ii. instructions issued by the Member State of registry competent authority, if they differ from sub-paragraph 1 or in the absence of specific recommendations, or 32. justify instructions defined by the owner, or the operator and approved by the Member State of registry, if they which differ from sub-paragraphs 1 and 2 above.”	Implementation problems 1. Existing text is confusing because paragraph (a) requires an approval of the complete maintenance programme (by the competent authority) and paragraph (c)(3) requires specific additional approval of owners instructions (by the State of Registry !) Basic principles must be : The owner/operator demonstrate compliance with basic manufacturer's instructions and additional instructions from the competent authority If the owner / operator wishes to divert he has to provide justification. Paperwork should be reduced to the essential in order to facilitate the work of the industry and better allocate authority's resources, we consider approving each and every amendment as unnecessary.	Text changed.
M.A.302 (c) (1)	Martin Ambrose, ERA	079	This paragraph makes reference to Part 21. Can the Agency advise us of the status of Part 21, i.e. will it be published and approved prior to the adoption of this Part M?		Part-21 will be an implementing rule as specified in the Regulation (EC) 1592/2002.
M.A.302 (c) (1)	Manfred Bialonczyk, BMVIT	081	Delete “ and component manufacturer ”.	Aircraft manufacturer is required to issue Instructions for Continued Airworthiness. This Instructions include also maintenance instructions for components reference to IR 21.	Contained in "other organisation required to publish such data by Part-21". No text change.
M.A.302 (c) (1)	ENAC, Italy	102	2. instructions issued by competent authority the Member State of registry, if they differ from sub-paragraph 1 or in the absence of specific recommendations, or 3. instructions defined by the owner, or the operator and approved by the competent authority Member State of registry, if they differ from sub-paragraphs 1 and 2. In M.1 point 4, the approval of the Airworthiness program is competence of the authority designated by the State of Registry. It is to be noted that no mention is made of the State of Operator, which retains the responsibility over the Air Operator Certificate, and usually performs the safety oversight on the operations.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302 (d)	Europe Air Sports	73	... The programme must include a reliability programme when the maintenance programme is based: 1. On Maintenance Steering Group logic, or; Mainly on condition monitoring	Introduction of a reliability program is not realistic for vintage aircraft used for recreational purposes maintained on a condition monitoring basis, other than to schedule inspections with annual inspections, and to comply with ADs as appropriate. In any case, the terms used in this sub-paragraph, ie, reliability programme, condition monitoring etc are not defined in Part M and this information must be provided.	Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: ->If the competent authority finds that these aircraft cannot conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply. No text change.
M.A.302 (d)	Loganair Glasgow	96	Maintenance Programme reliability programme appears to be required for all Aircraft – Not current policy or requirement eg DHC6 and BN2 aircraft.		The program only requires a reliability program when the program has been based upon MSG logic or condition monitored maintenance, which is not the case for BN2 or Dash 6. No text change.
M.A.302 (d)	LFV, Sweden	105	The text – “The programme must include a reliability programme when the maintenance programme is based.....” It is necessary with guidance material to ensure that such a reliability programme will be effective i.e. number of aircraft in the fleet etc. or utilization of other operators fleets’ reliability programme etc.		This subject is transferred from existing JAA TGLs and is covered in the AMC. No text change.
M.A.302 (e)	LBA	57	“...M.A.902 (b) the maintenance programme and its amendments of the maintenance programme may be approved through a maintenance programme procedure established by the M.A. Subpart G organisation managing the aircraft and this procedure shall be approved by the competent authority.”		This is already approved through the exposition. No text change.
M.A.302 (e)	IVW, The Netherlands	99	Since the maintenance program is necessary from day one of the life of an aircraft with a CofA and an ARC, and a controlled environment is only reached after the aircraft being one year in a Subpart G control, the initial issue of a maintenance programme cannot be approved by such a M.A. Subpart G organisation, as later amendments can. CAA-NL suggests to delete the words referring to an delegated approval of the initial maintenance programme. See also M.A.708(a)2.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.302 (e)	Hugo Spruyt Belgian Civil Aviation Authority	016	Delete paragraph (e) and associated material in M.B.xyz.	This paragraph suggests a situation that is not a safety measure. Indeed, in this situation it is very difficult for the Authority to have sufficient control of the organisation concerning his maintenance follow-up and the conformity of the maintenance programme with the approved data. In face, it will be more appropriate to preserve the approval by the Authority that is independent from the organisation. Moreover, the ICAO, by its annex 6 chapter 8 (note 2 and paragraph 8.3.1), explains that the Maintenance programme is approved by the State of the registry and not by the operator himself.	ICAO specifies that "approved" means directly or via a procedure. This is the definition taken for Part-M. Section B develops this concept and allows the competent authority to limit the scope of amendments that can be approved through a procedure. Text changed but not as proposed.
M.A.302(c) (2)	Manfred Bialonczyk, BMVIT	081	Replace Member State of registry by "agency"	AMCs and guidance material have to be issued by the agency. Member States can not deviate from agency instructions except in accordance to Article 10 of the regulation 1592 in case of safety related issues. (Standardisation between EU Member States)	The competent authority must be authorised to issue its own technical recommendations if it feels that those issued by a manufacturer are not too stringent for example. This is already the case today and is no an Agency issue as these are only recommendations. Text changed but not as proposed.
M.A.303	DGAC, France	162	Any airworthiness directive issued under Part 21 and any safety measures taken by the State of Registry must be carried out within the requirements of that airworthiness directive, unless otherwise specified by the Agency	Implementation problem: - For foreign aircraft leased by European operator the applicable AD are those of the State of Registry According article 10.1 of Regulation 1592, Member State can take measures to react to a safety problem.	Regulation (EC) 1592/2002 Article 4 paragraph 1 applies to third country aircraft operated on an EU AOC. Part-M would therefore apply. Urgent safety situations are covered by M.A.301 as changed. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.304	Europe Air Sports	73	All modifications and repairs shall be carried out using data approved by the Agency or by an approved Part 21 design organisation.	Guidance is required regarding repair procedures. For example, industry standard repair methods such as those contained in FAA AC.43.13 should be recognised. Recognition must be made of the fact that repairs to gliders have been based on standard repair methods for many years. These methods have been generated by NACs and NGBs but almost certainly have no approval basis under JAR 21. The requirement that data for all modifications and repair must be approved by "the Agency" (= EASA), seems excessively and unnecessarily strict and cumbersome, and may lead to a very time-consuming approval process. Primarily, this should be the task of the national competent authority, delegated to the approved airworthiness management organisation, especially for repairs. Another problem is that this rule does not distinguish between minor and major modifications / repairs.	AMC includes the applicable guidance as commented. No text change.
M.A.304	Martin Ambrose, ERA	079	Can the Agency advise how the data from a non Part 21 approved organisation would be dealt with? This is particularly pertinent to aircraft manufacturers based outside of the EU such as Embraer and Boeing? Additionally is it intended that this paragraph also applies to minor modifications?		Part-21 including associated certification bilateral addresses this issue. No text change.
M.A.304	Michael Loges, Rolls-Royce, Germany	062	For aircraft, product and components certified prior to JAR 21 / Part 21 following text should be added. Modification and repair data for aircraft, product and appliances of foreign type design, the approval of the foreign type certifying authority shall be deemed equivalent.		Part-21 including associated certification bilateral addresses this issue. No text change.
M.A.304	AEA Brussels	020	Approved Data. EASA will have to provide their definition of Approved data that will be applicable to all EU Member States.		Part-21 including associated certification bilateral addresses this issue. No text change.
M.A.304	H.T. Beekelaar, Martinair	008	Data for Modifications & Repairs Reference is made to ECAR-21 on the web it is indicated as IR-21. Why the difference. This happens frequently.		Text harmonised. Text changed.
M.A.305	CAA UK	123	Title of paragraph should be AIRCRAFT RECORD SYSTEM		Text changed.
M.A.305	CAA UK	123	The responsibility for the Aircraft Maintenance Records System needs to be defined in M A 201 Responsibilities		Text changed
M.A.305	CAA UK	123	A 305(a) requires a second sentence as follows 'Each entry shall be made as soon as practicable but in no event more than 30days		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			after the day of the maintenance action.'		
M.A.305	Warner van der Veer-Jehee, KLM Fleet Services	017	(See Also Remarks in relation to Attachment Explanatory Note to ANNEX 1) Entering flight cycles and hours in the aircraft logbooks, Hours and cycles are usually tracked by a computer system. The wording here should allow for a different procedure.		AMC specifies format of the logbook. No text change.
M.A.305	Tyrolean Airways	100	In lieu of Log books the possibility for computer record systems should be given.		AMC specifies format of the logbook. No text change.
M.A.305	LBA	57	The wording "aircraft maintenance record" in this paragraph has a different meaning than in Part 145 and M.A. 614. Another wording should be used e.g. "aircraft maintenance documentation system" (see also comment to M.A.614). In order to avoid confusion with existing wording in Part 145.		Text changed.
M.A.305	Martin Ambrose, ERA	079	Can the Agency advise how the use of computer based systems for record keeping will be covered by this Part M?		AMC specifies format of the logbook. No text change.
M.A.305	H.T. Beekelaar, Martinair	008	Aircraft Maintenance Record System Propeller logbooks are mentioned here. Possibilities to use digital record keeping is not mentioned		AMC specifies format of the logbook. No text change.
M.A.305	Jim Gibbons, KLM Engineering	130	(d) The Operator shall maintain records in a method acceptable to the NAA that consist of the current: Reason for change: Operators of large Fleets of aircraft have introduced electronic methods of recording some of the data specified.		AMC specifies format of the logbook. No text change.
M.A.305	Jim Gibbons, KLM Engineering	130	Note below to be added to MA 305 It is acceptable for the operator to use NAA approved alternative methods in lieu of log books for recording up to A checks, subject to the information being readily accessible. Reason for change: Operators of large Fleets of aircraft have introduced electronic methods of recording the data specified. To record this daily into log books is not practical and would prove to be unworkable for large carriers flying several sectors each day.		AMC specifies format of the logbook. No text change.
M.A.305 (a)	Warner van der Veer-Jehee, KLM Fleet Services	017	JAR-OPS requires a record system acceptable to the authority, ECAR M requires a record system in a form specified by the Member State. (the ECAR requirement goes far beyond current JAR requirements. Agency should only judge if records kept meet requirements)		Text not found. No text change.
M.A.305 (b)	Loganair Glasgow	96	Not all service life limited components have log cards.		The words "as appropriate" take this fact into account. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.305 (b)	LBA	57	Add "maintenance records" and "airworthiness review certificate" to the sentence, because these two kinds of documentation are also needed.		This paragraph deals with the supporting documents. The maintenance records are not kept with the log books today and the ARC is not an record but a document the must accompany the Certificate of airworthiness. No text change.
M.A.305 (b)	Martin Ambrose, ERA	079	This paragraph appears to require the use of log cards for "any service life limited component". Traditionally the use of log cards or log books has been reserved for use on engines, propellers, APUs, landing gear etc. Can the Agency please specify which components require a log card or book under this paragraph?		No specific list is available. This is type dependent. No text change.
M.A.305 (b)	CAA UK	123	Add the Technical Log to the list of documentation.		Text changed.
M.A.305 (d)	LBA	57	add: 7. maintenance records. These are the maintenance records which are described in 145.A.55. add: 8. Airworthiness Review Certificate The Airworthiness Review Certificates should be included in the "...record system".		Already covered in M.A.305(h). In M.A.305 (d) there are documents that summaries the status of an aircraft the can easily be carried with the logbooks if they are not computerised. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.305 (d)	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> . Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; . Mass and balance report (M.A. 305(d); 710(a) 9); . Operational directive (M.A. 301, item 5); . Aircraft to comply with approved AFM (M.A. 710(c)) <p>(It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft)</p> <ul style="list-style-type: none"> . Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airwo 		<p>ICAO annex 6 requires a maintenance program to be approved by the member state. Furthermore the rule does not prevent referral to TC holders/Manufacturers recommendations.</p> <p>No text change.</p>
M.A.305 (d)	Hugo Spruyt Belgian Civil Aviation Authority	016	<p>The record shall consist of the current:</p> <ol style="list-style-type: none"> 1.status of airworthiness directives with the flight hours, the flight cycles and the date of the last application. 2.status of modifications and repairs with the classification (minor or major); 3.status of compliance with maintenance programme; 4.status of service lift limited parts; 5.mass and balance report; 6.list of deferred maintenance. 7.A status of dents on aircraft. 8.A status of SB, SL that is applied on aircraft. 	<p>The paragraph “(d) 1.” Should specify that the AD status must contain the flight hours, flight cycles and the date of the last application of each AD, as it is planned in JAR OPS Subpart M. The paragraph “(d) 2.” Should require that the status of modifications and repairs gives the classification major or minor. This additional information could allow a better survey from the competent authority concerning the management of the repair by the operator. The new paragraph “7” is important because some dents can require several repetitive inspections. So, this particular follow-up is necessary for the continuing airworthiness. Concerning the new paragraph “8”, this proposal can be justified by the fact that these documents (SB, SL) can necessitate a maintenance follow-up and some of them don’t require a modification on aircraft. Moreover, this status can show the operator work in the continuing airworthiness.</p>	<p>Detailed in AMC.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.305 (d)	CAA UK	123	The initial wording associated with (d) should be amended to read "In addition, the records shall contain the current:"		Text changed.
M.A.305 (d) (3)	Loganair Glasgow	96	What type of statement of compliance is required ? New requirement		Word used is status and not statement. No text change.
M.A.305 (d) (3)	Loganair Glasgow	96	Appears to be no requirements for aircraft involved in an accident.		There is no justification. Why should there be a requirement in the status of compliance with the maintenance program dealing with accidents? No text change.
M.A.305 (d) (5)	Warner van der Veer-Jehee, KLM Fleet Services	017	Current Mass & Balance report is a new record in relation to JAR-OPS Subpart M. Is this an airworthiness maintenance record? If yes, why are there no further requirements in ECAR-M on Weight & Balance procedures?		Weight and Balance was contained in JAR OPS, however this was not in Subpart M. The frequency of weighing is part of the maintenance program. No text change.
M.A.305 (d) (5)	AEA Brussels	020	Mass and Balance Report is a new record in relation to JAR OPS. Is this really a record for putting in the maintenance record system?		Weight and Balance was contained in JAR OPS, however this was not in Subpart M. The frequency of weighing is part of the maintenance program. No text change.
M.A.305 (e)	Aircraft Electronics Association	152	Paragraph (e) refers to the "certificate of release to service" form. Throughout EASA Part M, Part 66, and Part 145 the title of EASA Form 1 is not consistent with the title of EASA Form 1, which is: "Authorised Release Authority". Every effort should be made to identify EASA Form 1 in a consistent manner throughout all regulations. Recommended Change: Amend Paragraph (e) and all other references throughout Part M, so that the term "certificate of release to service" is replaced with "Authorized Release Authority".		Text changed.
M.A.305 (e)	Ralph Schütte, Lufthansa Germany	150	The term EASA Form 1 or equivalent has to be defined precisely.		Detailed in AMC. No text change.
M.A.305 (e)	Ralph Schütte, Lufthansa Germany	025	The term EASA Form 1 or equivalent has to be defined precisely.		Detailed in AMC. No text change.
M.A.305 (e)	Lufthansa AG Germany	021	The term EASA Form 1 or equivalent has to be defined precisely, since there are major problems with the corresponding term in the JAR-regulations already: JAA Form 1? FAA 8130-3/4? TCA? CofC? What about new vs. Repaired components?		Detailed in AMC. No text change.
M.A.305 (e)	CAA UK	123	For clarity, insert -' relevant to any component installed..' after "...the following information.."		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.305 (f)	CAA UK	123	For consistency, change “..person accountable..” to “..person responsible..”		Text changed.
M.A.305 (g)	CAA UK	123	Remove the word “..concise..” as it is not a requirement		Text changed.
M.A.305 (h)	IVW, The Netherlands	99	Records must be “acceptable” to the authority, CAA-NL does not see the need to prescribe a uniform format to the industry and suggests to change the wording.		Text changed.
M.A.305 (h)	Manfred Bialonczyk, BMVIT	081	In M.A.305(h) the term “Member State” should be replaced by “competent authority”	To clarify which authority is responsible (see M.1 (4))	Text changed.
M.A.305 (h)	AEA Brussels	020	JAR OPS requires a record system acceptable to the authority. ECAR M requires a record system in a form specified by the member state. ECAR M goes far beyond current JAR requirements. The Agency should in fact only judge if records kept meet the requirements.		Text changed.
M.A.305 (h) (1)	IVW, The Netherlands	99	The owner/operator shall retain all detailed maintenance records. In M.A.614(b) or 145.A.55(b) the maintenance organisation is required to provide the owner/operator with certain documents and information. CAA-NL concludes that these documents are the records the owner/operator must retain.		These are specifically the maintenance records but this is not exclusive as other records that need to be retained by the owner/operator are detailed in M.A.302 (h)(2)-(6). No text change.
M.A.305 (h) (1)	CAA UK	123	For clarity, change wording ‘released to’ to ‘removed from’		Text changed but not as proposed.
M.A.305 (h) (1)	Manfred Bialonczyk, BMVIT	081	Change text in (h)(1) to: ..., at least twenty-four months after the aircraft has been permanently withdrawn from service,	The specified documentation should be stored twenty-four months after the aircraft has been permanently withdrawn from service,	Text changed.
M.A.305 (h) (2)	Manfred Bialonczyk, BMVIT	081	The text should read: ...of the aircraft and all certified life-limited components, at least twelve months after the aircraft or component has been permanently...	The terminology should be in line with M.A. 504 (c). The content of this sentence also applies to components.	Text changed.
M.A.305 (h) (3)	Manfred Bialonczyk, BMVIT	081	The text should read: ... subjected to an service life limit, at least...	The terminology should be in line with M.A. 305 (b) and other paragraphs of Part M.	Text changed but not as proposed.
M.A.305 (h) (4).	IVW, The Netherlands	99	CAA-NL suggests to include “the relevant component” status in the first part of the sentence to complete the records.		Text changed but not as proposed.
M.A.305 (h) (5)	Manfred Bialonczyk, BMVIT	081	The text should read: “... after the aircraft or component has been permanently...”	The content of this sentence also applies to components.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.305 (h) (6)	Manfred Bialonczyk, BMVIT	081	The text should read: "... after the aircraft, engine(s), propeller(s) and any other component vital to flight safety has been permanently..."	The content of this sentence also applies to all items mentioned in the proposed text.	Text changed but not as proposed.
M.A.306	Ralph Schütte, Lufthansa Germany	150	Add: M.A. 306 (d): The technical log system may be kept partially or in its entirety in an EDPsystem.	Argument: proposed supplemental sentence reflects the status of the art.	Detailed in AMC. No text change.
M.A.306	LBA	57	3.1 Change headline into: - "M.A.306 Operator's Technical Log System" 3.2 M.A.306 (a) 4: delete "outstanding", implement "rectifications", replace aeroplane by "aircraft". Text should be changed to: 4. all deferred defect rectifications that affect the operation of the aircraft, and ...		Text changed.
M.A.306	LFV, Sweden	105	Guidance material required ensuring that other important values like e.g. oil lift up, anti-icing, de-icing etc as stipulated in JAR-OPS Subpart M will be included in the Tech Log.		Detailed in AMC. No text change.
M.A.306	Manfred Bialonczyk, BMVIT	081	The "operator's technical log" is sometimes referred to as "aircraft technical log", "aircraft technical log system", etc. in M.A. 306, M.A. 307 and other paragraphs of Part M. The same term should be used throughout the document.	Editorial	Text changed.
M.A.306	Michael Loges, Rolls-Royce, Germany	062	Title is misleading; paragraph should be applicable to commercial operators only otherwise subparagraph (b) is misleading. Add "commercial" to the title.		This paragraph only applies to commercial air transport as stated in (a). Text changed but not as proposed.
M.A.306	Lufthansa AG Germany	021	Add: M.A. 306 (d): The technical log system may be kept partially or in its entirety in an EDP-system.	Argument: proposed supplemental sentence reflects the status of the art.	Detailed in AMC. No text change.
M.A.306 (a) (3)	LFV, Sweden	105	The text – "the current maintenance statement giving the aircraft" Guidance material necessary which defines "maintenance statement" since this has been a very controversial issue at MAST visits, especially when the maintenance is being contracted to a JAR-145.		Existing JAR OPS requirement. No text change.
M.A.306 (a) (4)	CAA UK	123	Remove the word "...outstanding..".		Existing JAR OPS requirement. No text change.
M.A.306 (c)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.306 (c) to: "... ensure that the operator's technical log is retained for at least thirty-six months after the date ..."	Maintenance records should be available for the longest period where airworthiness reviews have to be carried out (36 month in controlled environment), because the environment could change after 24 month and the ARC is valid 36 month. (Inconsistent!)	Text changed.
M.A.306 (c)	CAA UK	123	Remove the words "In the case of commercial air transport.." as they are not applicable		Text changed.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.306 (d)	Ralph Schütte, Lufthansa Germany	025	Add: M.A. 306 (d): The technical log system may be kept partially or in its entirety in an EDP system.	proposed supplemental sentence reflects the status of the art.	Detailed in AMC. No text change.
M.A.307	H.T. Beekelaar, Martinair	008	Transfer of aircraft maintenance records Part (b) is only talking about "Owner". Will this reflect on the Leasing company as well?		In this case M.A.201(e) specifies that only the owner may contract out the airworthiness tasks. Furthermore, M.A.201(b) specifies when a lessee takes over the lessor's responsibilities. No text change.
M.A.307 (a)	IVW, The Netherlands	99	Editorial, CAA-NL suggests to place the words " maintenance records " directly after the reference to M.A.305.		Text changed.
M.A.307 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	The owner or operator shall ensure when an aircraft is temporary transferred from one owner or operator to another that the M.A.305 and, if applicable, M.A.306 maintenance records and operator's technical log are available to the new operator. Note: In the context of (a), a judgement on what should be considered as a temporary change or owner or operator will need to be made by the competent authority in the light of the need to exercise control over the records, which will depend on access to them and the opportunity to update them.	This paragraph is added to take the short-term transfer into account. So, it will be interesting to introduce a procedure as is expected by the ICAO Annex 6 part I (Chap 8 § 8.4.3).	Detailed in AMC. No text change.
M.A.307 (b)	LBA	57	change wording: "...that the M.A.305 and,..." to "... that current copies of the M.A.305 maintenance records are transferred..." because the owner should keep the originals to ensure safe operations.		Text changed but not as proposed.
M.A.307 (c)	Warner van der Veer-Jehee, KLM Fleet Services	017	The Aircraft/Engine/Component logbook requirement as part of the maintenance records system is more prescriptive than JAR-OPS. (For large aircrafts most records are in computer systems).		Issue detailed in AMC but there is no 307 (c). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.308	ENAC, Italy	102	<p><i>M.A. 308 Flight tests (a)The person accountable pursuant to M.A. Subpart B shall organize, or make arrangements to organize, flight tests when necessary to assess aircraft performances and/or in flight operability of its parts and equipment.</i></p> <p><i>(b)Flight Tests shall be performed in the following cases:</i></p> <ol style="list-style-type: none"> 1. <i>when requested by the Maintenance Program;</i> 2. <i>following failures, incidents, repairs, overhauls and modifications that could affect aircraft performances;</i> 3. <i>every time aircraft airworthiness cannot entirely be assessed on ground;</i> 4. <i>when requested by the competent Authority.</i> <p><i>(c) Flight tests shall be performed in appropriate weather and visibility conditions</i></p> <p><i>(d)Only flight crew, technical staff necessary to execute the tests and other personnel authorized by the competent authority shall be on board an aircraft during a flight test.</i></p> <p><i>(e) The competent authority may request to participate</i></p>		Text changed but not as proposed. Text changed in paragraph M.A.301.
M.A.401	CAA UK	123	To align with Article 2 of the draft Commission Regulation definition, add the words " , with the exception of pre-flight inspection."		Text changed.
M.A.401	LBA	57	Is the replacement of an aircraft a maintenace action ? Text should read: "Aircraft maintenance includes any one or combination of overhaul, repair, inspection, modification or defect rectification of an aircraft or component including replacement of components."		Text changed.
M.A.401 (a)	CAA UK	123	Words "...including modifications or repairs" can be deleted as they are included in maintenance		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.402	Aircraft Electronics Association	152	Paragraph (c) requires that maintenance data must be transcribed onto work cards or worksheets. This requirement is excessively burdensome to individual light aircraft owners with little or no tangible benefit. General aviation aircraft typically do not have published work cards and therefore would have to be developed and published by each individual owner/operator. These aircraft have been maintained in accordance with the manufacturer's maintenance manuals or Instructions for Continued Airworthiness (on newer aircraft) with no known deficiencies. This additional burden should not be placed on general aviation aircraft owners. Recommended Change: Delete the second sentence in paragraph (c) and establish paragraph (d) which reads: "Commercial aircraft maintenance data, except simple maintenance tasks, must be transcribed onto work cards or worksheets."		Maintenance tasks need to be transcribed so as to allow the use of the instructions during accomplishment and their recording. This does not prevent just photocopying relevant pages of maintenance data. No text change.
M.A.402 (3) (b)	T. M. Gonzalez, Pratt & Whitney	084	3. instructions for continuing airworthiness, issued by type certificate holders, supplementary type certificate holders and any other organisation required to publish that publishes such data by in accordance with Part 21. <i>Comment: Clarification that the responsibility is for compliance with actually published data.</i>		Text changed.
M.A.402 (b)	LBA	57	The AMC 402 states: In the absence of maintenance and inspection standards published by organisation responsible for the type design maintenance personnel should refer to the relevant aircraft airworthiness standards and procedures published or used as guidance by the Agency or the Member State of Registry such as FAA Advisory Circular 43 or UK CAA Civil Aircraft Airworthiness Information and Procedures, etc. Therefore the Text in M.A.402 Maintenance data (b) 1. should give a provision for such data. The text should read: "1. any applicable requirement, procedure, standard or information issued or officially accepted by the competent authority",		Included in rule. No text change.
M.A.402 (b) (2)	DGAC, France	162	"2. any applicable airworthiness directive issued or adopted by the Agency and any safety measures taken by the State of Registry"	Implementation problem For foreign aircraft leased by European operator the applicable AD are those of the State of Registry According article 10.1 of Regulation 1592, Member State can take measures to react to a safety problem.	Already included in M.A.401 (b) (1). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.402 (b) (3)	Aerospace Industries	170	as follows: 3. instructions for continuing airworthiness, issued by type certificate holders, supplementary type certificate holders and any other organisation required to publish that publishes such data by in accordance with Part 21. Comment: Clarification that the responsibility is for compliance with actually published data.		Text changed.
M.A.402 (c)	Ralph Schütte, Lufthansa Germany	150For the purpose of routine maintenance (letter checks etc.) except for simple tasks, the maintenance data must be transcribed into work cards or work sheets.	Argument: "Non-routine" maintenance (=trouble shooting) cannot be planned and has to be performed according to approved data directly (Trouble shooting manual, Wiring diagram, Fault isolation manual, Maintenance manual, Structural repair manual etc.)	Text changed.
M.A.402 (c)	Finnair Oyj Technical Services	072	What is a simple maintenance task in this case?		Text changed.
M.A.402 (c)	Ralph Schütte, Lufthansa Germany	025For the purpose of routine maintenance (letter checks etc.) except for simple tasks, themaintenance data must be transcribed into work cards or work sheets.	"Non-routine" maintenance (=trouble shooting) cannot be planned and has to be performed according to approved data directly (Trouble shooting manual, Wiring diagram, Fault isolation manual, Maintenance manual, Structural repair manual etc.)	Text changed.
M.A.402 (c)	Martin Ambrose, ERA	079	This paragraph states that "the maintenance data must be transcribed onto work cards or work sheets". This would be a lengthy process for many tasks and, in some instances, would probably take longer to accomplish than the task itself. In general terms, would it not be acceptable to quote that the task had been accomplished in accordance with the chapter and verse reference numbers only?		Text changed.
M.A.402 (c)	Lufthansa AG Germany	021For the purpose of routine maintenance (letter checks etc.) except for simple tasks, the maintenance data must be transcribed into work cards or work sheets.	Argument: "Non-routine" maintenance (=trouble shooting) cannot be planned and has to be performed according to approved data directly (Trouble shooting manual, Wiring diagram, Fault isolation manual, Maintenance manual, Structural repair manual etc.)	Text changed.
M.A.402 (c)	Jim Gibbons, KLM Engineering	130	Does this only refer to Complex tasks indicated in M.A 801 para 2 and appendix 7 of part M. If not detailing all maintenance tasks on workcards will not be practical for the various types of A/C operated by the Airlines. The control and updating of Task Cards for older aircraft would be labour intensive. Non routine work, fault finding is not planned. Direct use of relevant manuals is required.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.402 (c)	Europe Air Sports	73	The person or organisation maintaining an aircraft shall ensure that all applicable maintenance data is current and readily available for use when required. Except for simple maintenance tasks, the maintenance data must be transcribed onto work cards or worksheets.	There is no definition of what constitutes a simple maintenance task.	Text changed.
M.A.402 ©	Loganair Glasgow	96	Need to qualify statement. Cannot transcribe all data onto work cards/worksheets. Introducing massive work requirement, control task and margin of error. - Clarify ' simple maintenance tasks'.		Text changed.
M.A.403	Warner van der Veer-Jehee, KLM Fleet Services	017	Maintenance data: The wording in this article does not allow KLM altered maintenance instructions or an equivalent declared part or tool, ref JAR 145.45 (d)		Text changed.
M.A.403	LBA	57	A new subparagraph should express, that documentation of the maintenance work in accordance with 145.A.45 shall be part of the performance of maintenance.		Text changed.
M.A.403 (a)	Europe Air Sports	73	All maintenance shall be performed by qualified personnel, following the methods, techniques, standards and instructions specified in M.A.402 maintenance data.	This sub-paragraph does not necessarily allow for pilot maintenance tasks? What does 'qualified personnel' mean? This term must be clearly defined. It is unrealistic to expect everyone carrying out work on an aircraft to be qualified to the standard of BCAR Section L or JAR/IR66. If this were the case, how would it be possible for unqualified personnel to gain experience prior to gaining a BCAR/JAR/IR licence? It is essential, for both economic and training requirements, that unqualified personnel be allowed to conduct maintenance work whilst under the supervision of a qualified person.	Pilot maintenance as described in Appendix 8 requires the pilot to be in compliance with M.A.402 which implies that he is qualified. The pilot carrying out such tasks, just as any person carrying out maintenance in general must be qualified to carry them out. The license is needed to release maintenance except of course for pilot owner maintenance. (See Subpart H) No text change.
M.A.403 (a)	CAA UK	123	Add a new sentence 'Independent inspections will be required after any flight safety sensitive maintenance tasks' as they were omitted from original text. The AMC for Independent inspections has been written.		Text changed.
M.A.403 (a)	Jim Gibbons, KLM Engineering	130	This subparagraph is not practical and lowers maintenance standards. How can a verification check on a critical aircraft system be carried out without issuing a CRS to indicate it has been done.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.403 (b)	Aircraft Electronics Association	152	Paragraph (b) requires that “all maintenance shall be performed using tools, equipment and materials specified in the M. A. 402 maintenance data”. Paragraph (b) does not recognize the use of alternative equipment and tools and is in conflict with EASA Part 145. Recommended Change: Amend the first sentence in paragraph (b) to read: “All maintenance shall be performed using the equipment, tools and materials specified in the M.A. 402 maintenance data or equivalent equipment and/or tools may be used.”		Text changed.
M.A.403 (b)	Loganair Glasgow	96	No allowance for manufacture of tooling as currently in place.		Text changed.
M.A.403 (c)	Loganair Glasgow	96	Too wide a statement – what is classed as contamination. requires definition		Text changed .
M.A.403 (c)	Europe Air Sports	73	The area in which maintenance is carried out shall be as clear and clean in respect of dirt and contamination as appropriate for the maintenance work being carried out.	For private light aircraft, it should be recognized that it should be acceptable to perform most general maintenance tasks in the hangar where the aircraft is kept. It should be recognized that it is often the case that standards of cleanliness will vary in these circumstances.	Text changed but not as proposed.
M.A.403 (e)	Aircraft Electronics Association	152	Paragraph (e) requires the use of “proper facilities” in the case of inclement weather or lengthy maintenance. Paragraph (e) should recognize the use of personal equipment to protect the technicians from the elements when either the maintenance task, available hangar space, or the length of the maintenance task prohibits or otherwise makes it impractical to place the aircraft in a “proper facility.” In addition, some maintenance must be performed outside, and often may be lengthy maintenance tasks, in which case, it would be inappropriate to conform to the requirements of this section. Recommended Change: Amend paragraph (e) to read: “In case of inclement weather, proper facilities or personal equipment shall be used. In the case of lengthy maintenance, not required to be performed out of doors, proper facilities shall be used.”		Will be defined in AMC. No text change.
M.A.403 (e)	Loganair Glasgow	96	Clarify 'inclement weather'.		Will be defined in AMC. No text change.
M.A.403 (e)	Martin Ambrose, ERA	079	Can the Agency provide definitions for the terms “inclement”, “lengthy” and “proper” that are used to determine the facilities to be used?		Will be defined in AMC. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.403 (e)	Richard A. Peri Aircraft Electronics Association	EASA _ comment t MA403(e	Paragraph (e) requires the use of “proper facilities” in the case of inclement weather or lengthy maintenance. Paragraph (e) should recognize the use of personal equipment to protect the technicians from the elements when either the maintenance task, available hangar space, or the length of the maintenance task prohibits or otherwise makes it impractical to place the aircraft in a “proper facility.” In addition, some maintenance must be performed outside, and often may be lengthy maintenance tasks, in which case, it would be inappropriate to conform to the requirements of this section. Recommended Change: Amend paragraph (e) to read: “In case of inclement weather, proper facilities or personal equipment shall be used. In the case of lengthy maintenance, not required to be performed out of doors, proper facilities shall be used.”		Will be defined in AMC. No text change.
M.A.403 (f)	Aircraft Electronics Association	152	Paragraph (f) requires that the aircraft is “clean” after completion of all maintenance. The cosmetic appearance of the aircraft is not a safety issue and is inappropriate for inclusion in this regulation. Recommended Change: Amend paragraph (f) to read: “After completion of all maintenance a general verification must be carried out to ensure the aircraft or component is clear of all tools, equipment and any other extraneous parts and material, and that all access panels removed have been refitted.”		Text changed.
M.A.403 (f)	Martin Ambrose, ERA	079	It is felt that this paragraph is too prescriptive and should be removed from the text.		Text changed.
M.A.403 (f)	Richard A. Peri Aircraft Electronics Association	EASA _ comment t MA403(f	Paragraph (f) requires that the aircraft is “clean” after completion of all maintenance. The cosmetic appearance of the aircraft is not a safety issue and is inappropriate for inclusion in this regulation. Recommended Change: Amend paragraph (f) to read: “After completion of all maintenance a general verification must be carried out to ensure the aircraft or component is clear of all tools, equipment and any other extraneous parts and material, and that all access panels removed have been refitted.”		Text changed.
M.A.404	LBA	57	A new subparagraph should express, that documentation of the maintenance work in accordance with 145.A.55 shall be part of the performance of maintenance.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.404	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> . Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; . Operational directive (M.A. 301, item 5); . Mass and balance report (M.A. 305(d); 710(a) 9); . Aircraft to comply with approved AFM (M.A. 710(c)) <p>(It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft)</p> <ul style="list-style-type: none"> . Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airwo 		<p>These requirements are either existing are existing JAR OPS/M requirements or covered by the ICAO requirements for continuing airworthiness.</p> <p>No text change.</p>
M.A.404	Martinair Holland	089	<p>According M.A. 404, aircraft defect deferral and rectification is seen as part of maintenance <i>standards</i>. This is questionable. Defect deferral is not part of maintenance (see definition of maintenance), but it is part of continuing airworthiness. Its inclusion in Subpart C (M.A. 301 - item 2) is therefore considered appropriate. For aircraft engaged in commercial air transportation, defect handling requirements should be expanded in this Subpart C by adopting Subpart C of JAR/MMEL/MEL regulations.</p>		<p>The assessment of a defect is a maintenance activity as detailed in maintenance standards M.A.404.</p> <p>No text change.</p>
M.A.404	P. Doyer, AEI	034	<p>Sub paragraphs (b) 1 and 2. It must be that such work may be carried out by flight crew, but that there must be some record that such flight crew (pilots) have had training on the use of the M.E.L. i.e. the carrying of one defect may preclude the carrying of another defect on the same system although it is an item covered by the M.E.L.</p>		<p>This is not covered by the scope of this Part. It is part of the remaining JAR OPS concerning the hadeling of the technical log by the flight crew.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.404 (a) (2)	ENAC, Italy	102	<p>2. in those cases where no MEL is approved or is mandated by operational requirement, the aircraft defect relates to unserviceable operational equipment required by operational requirements where:</p> <p>(i) <i>only the pilot can determine whether such that those equipment would will not be be needed during the particular flight; and</i></p> <p>(ii) <i>the equipment are not connected to other aircraft equipment or systems, whose proper performance and use could be affected by the unserviceable equipment.</i></p> <p><i>The second part of the change is needed because the pilot assessment is not sufficient to understand the relationship between various kind of equipment. The change is needed because with the original text the operational rules or approved MEL could be bypassed.</i></p> <p><i>In a simple case the pilot may fly with some life jacket not efficient, because the life jacket is a stand-alone equipment, and therefore its unserviceability does not impinge any other e</i></p>		Text changed but not as proposed.
M.A.404 (a) (2)	Loganair Glasgow	96	Clarification required on 'operational equipment'.		Text changed but not as proposed.
M.A.404 (b)	Aircraft Electronics Association	152	Paragraph (b) identifies that only an authorized certifying staff can determine whether an aircraft defect can affect flight safety. This paragraph expands on the limitation explained in paragraph (a). Therefore paragraph (b) should be a subparagraph to paragraph (a), not a subsequent paragraph. Recommended Change: Change the numbering of paragraph (b) to (1) and renumber subparagraphs (1) and (2) and paragraphs (c) and (d) appropriately.		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.404 (b)	Europe Air Sports	73	Only the authorised certifying staff, according to M.A.801 (b) 1, M.A.801 (b) 2 or Part 145, or the pilot in command of the aircraft, can determine.....	There will be many defects that a pilot of a light aircraft, glider or balloon could assess as not affecting flight safety. Therefore, restricting the judgement to authorised certifying staff (unless this includes the owner/pilot) is not appropriate or necessary, particularly bearing in mind that the certifying maintenance staff may not have any greater understanding of the implications than the pilot, and their non-availability in an amateur club environment on any particular day could prevent a safe flight unnecessarily. Propose that owner/pilot can make assessment, and if the pilot is in doubt he can always consult a suitably qualified person.	Text changed but not as proposed.
M.A.404 (b)	LBA	57	A description for postponing repairs and maintenance task should be added to M.A.404. For commercial air transport the responsibility of the operator for defect rectification needs to be added.		Text changed but not as proposed.
M.A.404 (b) (2)	Martin Ambrose, ERA	079	Can the Agency please specify what is meant by the term "operational equipment"?		Text changed.
M.A.404 (c)	FAA USA	174	This seems to be a very arbitrary requirement, and some defects not addressed in due time may develop into safety-affecting items. Suggest that a definitive period for corrective action be implemented (e.g. within 30-60 days of detection, before the next five flights, before the next scheduled maintenance period, or sooner, etc.)		Text changed but not as proposed.
M.A.404 (d)	CAA UK	123	"..defect not rectified immediately.." to "..deferred defect..". UK CAA do not agree that only certifying staff determine whether a defect could affect flight safety		Text changed but not as proposed.
M.A.404(b)	CAA UK	123	should be reduced to "This does not apply when the defect is deferred in accordance with the MEL".		It is a pilot action to defer the defect. He may chose not to. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.404(b)	DGAC, France	162	“Only the authorised certifying staff, according to M.A.801(b)1, M.A.801(b)2 or Part 145 can determine/decide, using M.A.402 maintenance data, whether an aircraft defect could affect flight safety and therefore decide when and which rectification action should be taken/shall be corrected before further flight or whether defect rectification can be reported. This does not apply when, however [...]”	Implementation problem: In large organisations, determination of the impact of the defect on flight safety is made by the technical department and not by the certifying staff who will only sign the technical log Editorial: This paragraph could be misunderstood and read as meaning that maintenance personnel are not involved in sub-paragraph 1 and 2, when obviously the intent is just to allow the pilot to take the decision alone in specific cases and not to avoid the input of the maintenance personnel.	Text changed.
M.A.404(b)	Richard A. Peri Aircraft Electronics Association	EASA _ comment MA403(f)	Paragraph (b) identifies that only an authorized certifying staff can determine whether an aircraft defect can affect flight safety. This paragraph expands on the limitation explained in paragraph (a). Therefore paragraph (b) should be a subparagraph to paragraph (a), not a subsequent paragraph. Recommended Change: Change the numbering of paragraph (b) to (1) and renumber subparagraphs (1) and (2) and paragraphs (c) and (d) appropriately.		Text changed.
M.A.404(b)	Jean-Francis Suquet, Eurocopter	004	The authorised certifying staff, according to M.A.801(b)1, M.A.801(b)2 or part 145, has to ensure that aircraft defect which could affect flight safety are corrected by the appropriate rectification action using M.A.402 maintenance data, has been taken.	The certifying may not decide himself the needed rectification action. In large maintenance organisations, there is a dedicated technical department in charge of identifying the needed rectification action.	The person who releases the aircraft is responsible for determining the technical action requirement. That person may be assisted by any number of other people in large maintenance organisations on example, but finally this will be the person releasing and taking the final responsibility. No text change.
M.A.404(b) 1&2	Mike Newman, ALAE	009	It must be that such work may be carried out by flight crew, but that there must be some record that such flight crew (pilots) have has training on the use of the M.E.L. i.e. the carrying of one defect may preclude the carrying of another defect on the same system although it is an item covered by the M.E.L.		This is not covered by the scope of this Part. It is part of the remaining JAR OPS concerning the handling of the technical log by the flight crew. No text change.
M.A.404(c)	CAA UK	123	should be removed in toto.		Text changed but not as proposed.
M.A.501	Ralph Schütte, Lufthansa Germany	150	add TGL 11 § 6.2.1 as new M.A. 501 (e)	Argument: The handling and eligibility of PMA parts must be described.	Addressed by the AMC. No text change.
M.A.501	Hugo Spruyt Belgian Civil Aviation Authority	016	(e) Aircraft component release certificates issued by appropriately approved organisation before the entry into force of this PART-M remain valid.	It should be appropriate to re-introduce this paragraph to take the old certificate into account.	Already covered in AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.501	Mr Cartry	173	<p>For repairs of light aircrafts or of gliders it is often used spares like a wing or a fuselage or control surfaces coming from a non flying or a damaged aircraft. No text takes care of this subject. We propose that such spares can be declared good for flight at the positive issuance of examinations.</p> <p>The examination is performed with technical suitable means like:</p> <ul style="list-style-type: none"> -Visual examination, Visual examination with little television camera, -Penetrant, -Eddy current, -Ultrasonic testing, -Radio or gammagraphy, -Taping (for composite frames). <p>A technical report is issued at the end of the examination.</p>		<p>Subject developed in M.A.613 plus AMC as only an approved organisation may carry out these activities.</p> <p>No text change.</p>
M.A.501	Fédération Française de vol en voile	26	<p>For repairs of light aircraft or of gliders it is often used spares like a wing or a fuselage or control surfaces coming from a non flying or a damaged aircraft. No text take case of this subject. We propose that such spares can be declared good for flight at the positive issuance of examinations.</p> <p>The examination is performed with technical suitable means like:-</p> <ul style="list-style-type: none"> Visual examination, Visual examination with little television camera, Penetrant, Eddy current, Ultrasonic testing, Radio or gammagraphy, Taping (for composite frames). <p>A technical report is issued at the end of the examination.</p>		<p>Subject developed in M.A.613 plus AMC as only an approved organisation may carry out these activities.</p> <p>No text change.</p>
M.A.501	Fédération Française de vol en voile	39	<p>For repairs of light aircrafts or of gliders it is often used spares like a wing or a fuselage or control surfaces coming from a non flying or a damaged aircraft. No text takes care of this subject. We propose that such spares can be declared good for flight at the positive issuance of examinations.</p> <p>The examination is performed with technical suitable means like:</p> <ul style="list-style-type: none"> - Visual examination, - Visual examination with little television camera, - Penetrant, - Eddy current, - Ultrasonic testing, - Radio or gammagraphy, - Taping (for composite frames). <p>A technical report is issued at the end of the examination.</p>		<p>Subject developed in M.A.613 plus AMC as only an approved organisation may carry out these activities.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.501	ENAC, Italy	119	Overlap between the above paragraphs is noted. If repetition of same subject in more than one rule is necessary proper interface should be ensured to avoid duplication and confusion in the subsequent management. Add the italic underlined note at the bottom of M.A.501 and 145.A.42, as follows: M.A.501 Installation (a) No component may (b) Prior to installation of a component on..... (c) Standard parts shall only be fitted to (d) Material being either raw material or consumable material shall <i>Note: Airworthiness release of new component is regulated by Part 21 and BASA IPAs.</i>		This paragraph does not address the release of components. No text change.
M.A.501	Loganair Glasgow	96	What will be the 'equivalent' of EASA Form 1?		Covered in AMC.
M.A.501	Ralph Schütte, Lufthansa Germany	025	add TGL 11 § 6.2.1 as new M.A. 501 (e)	The handling and eligibility of PMA parts must be described.	Covered in AMC.
M.A.501	Lufthansa AG Germany	021	add TGL 11 § 6.2.1 as new M.A. 501 (e)	Argument: The handling and eligibility of PMA parts must be described.	Covered in AMC.
M.A.501	H.T. Beekelaar, Martinair	008	Amendment status is missing versus JAR-OPS Subpart M en JAR 145		There is no reference to these rules in Part-M. No text change.
M.A.501	Michael Loges, Rolls-Royce, Germany	062	This subpart does not take into account that there are several component which are used in commercial and non commercial aviation. A release for such a component must be useable for both types of use.		An EASA Form 1 is used in all cases but for commercial air transport only a Form 1 issued in accordance with Part-145 can be used. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.501 (a)	Europe Air Sports	73	No <u>component specified in the type certificate or equivalent as essential to primary flight safety</u> may be fitted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form 1 or equivalent	<p>The requirements of (a) and (b) do not distinguish between flight-safety critical and non-critical components or materials, and does not distinguish between classes of aircraft, when requiring that all must be released by an EASA Form One or equivalent.</p> <p>This will lead to problems related to installation of non-compulsory or "non flight safety critical" equipment in gliders, e.g. soaring flight computers / electronic variometers and GPS flight recorders. Such equipment not only used in most gliders but also is also absolutely essential for achieving sporting and recreational performance as distinct from safe flight. Such equipment is not normally manufactured by companies approved to issue JAR/EASA Form One certificates.</p> <p>It should be noted that many countries have simplified regulations for non flight-safety critical equipment, in particular GPS receivers for use in aircraft that are VFR equipped only.</p>	Components fitted to the aircraft are part of the aircraft and therefore must be released appropriately. No text change.
M.A.501 (a)	LBA	57	The word "equivalent" should be explained in an AMC (in correlation with 145.A.42(a)).		Covered in AMC.
M.A.501 (a)	IVW, The Netherlands	99	CAA-NL thinks AMC material is needed to clarify how to handle with old JAA-Form Ones.		Covered in AMC.
M.A.501 (a)	LFV, Sweden	105	The text – "release to service on an EASA Form 1 or equivalent." Guidance material required like TGL 11 in order to refer to FAA 8130-3 etc.		Covered in AMC.
M.A.501 (a)	DGAC, France	162	"(a) No component, except standard parts, may be fitted unless it is in a satisfactory condition and has been appropriately released to service on anis accompanied by an authorised release certificate EASA Form 1 or equivalent "	<p>Implementation problem</p> <ul style="list-style-type: none"> - Equivalent to Form One is not defined and could lead to various interpretations - M.A.802 requires a Form One for component release - Acceptance of components released before entry into force of the regulation, including JAA Form One, must be defined in the core of the regulation (see comment 2 on article 3 of the regulation). <p>Acceptance of Forms under bilateral agreements are</p>	Covered in AMC.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				covered by the bilateral.	
M.A.501 (a)	Aerospace Industries	170	Revise as follows: (a) No component may be fitted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form 1 or equivalent. Internal documentation, within a maintenance organization, which indicates that a component has remained within that organization or under its control and is acceptable for installation, is to be considered as an equivalent form. <i>Comment: A maintenance organization, such as an engine shop, performs many inspections and repairs internally and, in various manners, approves these parts for re-installation. It would be an administrative burden if a Form One were required to be issued for each part that was found or made suitable for installation within the maintenance organization.</i>		Covered in AMC.
M.A.501 (a)	T. M. Gonzalez, Pratt & Whitney	084	(a) No component may be fitted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form 1 or equivalent. <u>Internal documentation, within a maintenance organization, which indicates that a component has remained within that organization or under its control and is acceptable for installation, is to be considered as an equivalent form.</u> <i>Comment: A maintenance organization, such as an engine shop, performs many inspections and repairs internally and, in various manners, approves these parts for re-installation. It would be an administrative burden if a Form One were required to be issued for each part that was found or made suitable for installation within the maintenance organization.</i>		Covered in AMC.
M.A.501 (b)	Europe Air Sports	73	Prior to installation <u>on an aircraft</u> of a component <u>specified in the type certificate or equivalent as essential to primary flight safety</u> , the person or approved maintenance organisation shall satisfy itself that the eligibility and status of the <i>[particular]</i> <u>specified</u> aircraft component permits <u>that</u> component to be fitted.....etc.	See comments above	Components fitted to the aircraft are part of the aircraft and therefore must be released appropriately and eligible for fitment to the aircraft. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.501 (b)	Martin Ambrose, ERA	079	The last sentence contains a grammatical error. The second occurrence of the phrase “for maintenance manual to improve access” needs to be deleted.		Text changed.
M.A.501 (c)	Europe Air Sports	73	This requires re-drafting to cater for the position of, particularly, historic aircraft and those where the original manufacturer is no longer in existence and there is no successor-approved organisation.	Sub-paragraphs (c) and (d) introduce very strict requirements for “standard” parts and materials. The requirement for a “conformity statement” may lead to excessive paperwork in cases where “commercial standard components” can be used. For older aircraft, generally without support from the manufacturer (who no longer exists) standard parts are simply not always available and therefore alternative solutions have to be found, with due attention to airworthiness.	Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: -> If the competent authority finds that these aircraft cannot conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply. No text change.
M.A.501 (c)	Loganair Glasgow	96	Clarification required on the definition of 'standard parts'		Common industry term. No text change.
M.A.501 (c)	Tyrolean Airways	100	By definition a part is (also) a component. Does this para intend that a „Standard part“ has to be accompanied by an EASA Form 1 (acc. subpara a) <u>and</u> a conformity statement from the manufacturer?		Covered in AMC.
M.A.501 (c)	LBA	57	AMC material for a Standard for a "conformity statement" should be available.		Text changed.
M.A.501 (c)	FAA USA	174	Second sentence creates a requirement on manufacturers, which is beyond scope of this Commission Regulation. Propose alternate text: “Standard parts shall only be fitted when accompanied by evidence of conformity to the applicable standard.”		Text changed.
M.A.501 (c)	Martin Ambrose, ERA	079	How do these paragraphs cater for the use of commonly used equivalents, as is often the case with minor hardware such as nuts, screws, washers etc?		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.501 (d)	Europe Air Sports	73		See comment above. The requirement for specific raw materials and "consumables" to be stated in "manufacturers maintenance data" will be a particular problem for maintaining and repairing older gliders, for which either the manufacturer no longer exists and / or the materials originally specified are no longer available and suitable alternatives can and are used. It is also undesirable that M.A. 501 does not provide any options for exceptions to this regulation.	Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: -> If the competent authority finds that these aircraft cannot conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply. No text change.
M.A.501 (d)	CAA UK	123	Replace with wording from Part 145 A.42(a)(3) as this provides a clearer explanation. i.e. Material both raw and consumable used in the course of maintenance when the organisation is satisfied that the material meets the required specification and has appropriate traceability. All material must be accompanied by documentation clearly relating to the particular material and containing a conformity to specification statement plus both the manufacturing and supplier source.		Text changed.
M.A.501 (d)	Aerospace Industries	170	(d) Material being either raw material or consumable material shall only be used in an aircraft or a component when the aircraft or component manufacturer or otherwise approved Part 21 organization as provided for under M.A. 402 (b)3 states so in relevant maintenance data. <i>Comment: Part 21 organizations are authorized to prepare maintenance data. Further, partially finished material, sometimes known as repair details, may be authorized in DOA documentation that is not necessarily aircraft or component manufacturer issued maintenance data. This must be provided for. Also, some NAAs have accepted FAA DER repairs (for example, reference TGL No. 22), which often incorporate repair details and local fabrication. These must also be considered. AMC or guidance material can address these issues.</i>		Relevant maintenance data includes M.A.402 (b) 3. Bilateral provisions are not dealt with in this Part. No change.
M.A.501(b)	CAA UK	123	Replace with "Prior to the installation of a component its eligibility and status with respect to modifications and/or airworthiness shall be ascertained."		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.502	Ralph Schütte, Lufthansa Germany	025can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access is much too restrictive and does not reflect realities since in many cases there are no such hints in the aircraft documentation (which includes Trouble Shooting Manual, Fault Isolation Manual etc.). The requirement must be to follow strictly Standard Practices (which are part of the approved data) plus any approved data where applicable.		This is not relevant to this paragraph. Here the issue is the maintenance of components themselves not the removal of components for trouble shooting purposes. No text change.
M.A.502	Virgin Atlantic Airways	153	ECAR_M1.502 states "component maintenance to be performed by ECAR-M1.801b2 certifying staff only while such components are fitted to the aircraft except that such parts may be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access". ECAR M1.801 refers to the aircraft CRS. This conflicts with ECAR145.50a4 which states that all component maintenance off aircraft must be certified by issue of an EASA Form 1. Clarification required.		Part-M and Part-145 harmonised. Text changed.
M.A.502	Europe Air Sports	73	[Requires revision in accordance with comments]	It is a problem that the term "maintenance" does not distinguish between different types of maintenance, e.g. functional testing or installation/removal versus operations actually being an intrusion into the component. Again, for gliders, the components affected by this rule should only be those that form part of the type certificate of airworthiness or equivalent items that are safety-critical.	Maintenance is defined in the Draft Regulation. No text change.
M.A.502 (b)	Per Olafsen Wideroe Airline	028	The wording:....."manual to improve access for maintenance" is written twice. (typing error?)		Text changed.
M.A.502 (b)	ENAC, Italy	102	<i>(b) Maintenance on any component may be performed by M.A.801(b)2 certifying staff only whilst such components are fitted to the aircraft. Such components, nevertheless, can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access for maintenance manual to improve access for maintenance. Editorial – there's a repetition of the phrase "for maintenance manual to improve access for maintenance"</i>		Text changed.
M.A.502 (b)	P. Doyer, AEI	034	Typographical error 4th line down, delete the words "to improve access for maintenance manual" after "aircraft maintenance manual".		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.502 (b)	Mike Newman, ALAE	009	Typographical error 4 th line down, delete the words "to improve access for maintenance manual" after "aircraft maintenance manual".		Text changed.
M.A.502 (b)	Ralph Schütte, Lufthansa Germany	150can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access is much too restrictive and does not reflect realities since in many cases there are no such hints in the aircraft documentation (which includes Trouble Shooting Manual, Fault Isolation Manual etc.). The requirement must be to follow strictly Standard Practices (which are part of the approved data) plus any approved data where applicable.		This is not relevant to this paragraph. Here the issue is the maintenance of components themselves not the removal of components for trouble shooting purposes. No text change.
M.A.502 (b)	Lufthansa AG Germany	021can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access is much too restrictive and does not reflect realities since in many cases there are no such hints in the aircraft documentation (which includes Trouble Shooting Manual, Fault Isolation Manual etc.). The requirement must be to follow strictly Standard Practices (which are part of the approved data) plus any approved data where applicable.		This is not relevant to this paragraph. Here the issue is the maintenance of components themselves not the removal of components for trouble shooting purposes. No text change.
M.A.502 (b)	CAA UK	123	The words 'manual to improve access for maintenance' is a duplication and should be removed		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.503	Europe Air Sports	73		<p>The requirement to abide by service limits of components is not consistent with the current arrangements for extending the lives of engines under, for example, UK CAA Airworthiness Notice 35, and many aircraft would be grounded if their engines were not able to continue in use beyond the manufacturers published TBO.</p> <p>The requirement that components may only be removed for maintenance "when such removal is expressly permitted by the aircraft maintenance manual" is unnecessarily strict, particularly because maintenance manuals for gliders and light aircraft do not usually specify allowable removal/installation of components to this degree of detail. This appears to be a new requirement, which has not been present in earlier versions of ECAR-M that have been reviewed previously, and does not seem to have been introduced as a result of any review comment. This particular requirement should be deleted.</p> <p>To remove the ability to operate engines beyond their published TBO in accordance with CAA Airworthiness Notice 35</p>	<p>The approved maintenance program as defined in M.A.302 (c) (2) allows for instructions issued by the competent authority such as UK CAA Airworthiness Notice 35 to be incorporated in the approved maintenance program.</p> <p>No text change.</p> <p>Component maintenance must be carried out in an approved organisation as there is no component license according to ICAO. M.A.502 (b) is already an alleviation.</p> <p>No text change.</p>
M.A.503	Loganair Glasgow	96	Will variations as per SMP 20 be allowed?		<p>The approved maintenance program as defined in M.A.302 (c) (2) allows for instructions issued by the competent authority such as UK CAA SMP 20 to be incorporated in the approved maintenance program.</p> <p>No text change.</p>
M.A.503	P. Doyer, AEI	034	Suggest it should read:- Installed service life limited components shall not exceed the approved service life limit as specified in the approved maintenance programme and airworthiness directives, unless an extension is granted by the manufacturer or supplemental type certificate holder and such an extension is approved by the competent Authority.		<p>Permitted variations are developed in Section B and extensions are addressed in M.A.302 (c) (3).</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.503	Mike Newman, ALAE	009	Suggest it should read:- Installed service life limited components shall not exceed the approved service life limit as specified in the approved maintenance programme and airworthiness directives, unless an extension is granted by the manufacturer of supplemental type certificate holder and such an extension is approved by the competent Authority.		Permitted variations are developed in Section B and extensions are addressed in M.A.302 (c) (3). No text change.
M.A.504	Warner van der Veer-Jehee, KLM Fleet Services	017	What is the intention of "managing in a controlled manner" in relation to components retained for training purposes?		Text changed.
M.A.504 (a) (2)	LFV, Sweden	105	M.A. 504 (a) 2 where the text reads –“and other continued airworthiness requirements mandated by the Agency;” A clarification of “other continued airworthiness requirements” is required. M.A. 504 (a) 5. Guidance material like JAR TGL 10 & 11 required enabling understanding how components shall be dealt with after an incident or accident.		1. Clarified in AMC M.A.301-5. 2. Clarified in AMC. No change.
M.A.504 (a) (5)	Loganair Glasgow	96	No mention of return to service of parts post incident / accident.		This is not a subject developed in this paragraph. No text change.
M.A.504 (a) (5)	Martin Ambrose, ERA	079	Can the Agency provide a definition for the term “incident”?		See ICAO definition for "incident".
M.A.504 (a) (5)	Manfred Bialonczyk, BMVIT	081	In M.A.504 (a) 5 add before "involvement" "direct".	If an aircraft was involved in an incident/accident not all components should be necessarily classified as unserviceable.	Text changed.
M.A.504 (a) 4	CAA UK	123	For clarity, insert “ <u>known</u> defects..”		Text changed but not as proposed.
M.A.504 (a) 5	CAA UK	123	For completeness, add words “..likely to affect it’s serviceability. Add new item “6. if it has exceeded it’s storage limits and / or shelf-life.”		Text changed.
M.A.504 (b)	Ralph Schütte, Lufthansa Germany	150	The intend of M.A. 504 (b) is understood, but since 504 (a) 4 refers among others to: “presence of defects or malfunctions” all unserviceable components – including those in the repair cycle (shop) must be locked. This cannot be the intention. Either change wording by: ...shall be segregated... access only to authorised personnel...or use another definition rather than “unserviceable components” See also M.A. 605 (c).		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.504 (b)	Europe Air Sports	73	Unserviceable components shall be identified.	<p>It is simply unrealistic to expect that in the light aircraft and glider environment, unserviceable parts would be identified and kept under the control of an approved organisation and stored in a secure place.</p> <p>Instances of worn-out or unserviceable parts, in this sector of aviation, being put back into service are virtually non-existent.</p> <p>This proposed bureaucracy is unnecessary and unenforceable.</p>	Standard engineering practices require identification and control of unserviceable components. No text change.
M.A.504 (b)	Ralph Schütte, Lufthansa Germany	025	The intend of M.A. 504 (b) is understood, but since 504 (a) 4 refers among others to: "presence of defects or malfunctions" all unserviceable components – including those in the repair cycle (shop) must be locked. This cannot be the intention. Either change wording by: ...shall be segregated... access only to authorised personnel...or use another definition rather than "unserviceable components" See also M.A. 605 (c).		Text changed.
M.A.504 (b)	Lufthansa AG Germany	021	The intend of M.A. 504 (b) is understood, but since 504 (a) 4 refers among others to: "presence of defects or malfunctions" all unserviceable components – including those in the repair cycle (shop) must be locked. This cannot be the intention. Either change wording by: ...shall be segregated... access only to authorised personnel...or use another definition rather than "unserviceable components" See also M.A. 605 (c).		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.504 (b)	DGAC, France	162	These paragraphs should be “reserved” for the time being	Implementation problem: This is a completely new requirement with various implications, which does not appear mature enough. Here are examples of questions raised: What shall an independent mechanic do if before fitting a component he finds it is unserviceable or unsalvageable (for instance because it has been damaged) until he can find an approved organisation for securing the part ? What if no approved maintenance organisation wants to keep that part for an aircraft they do not maintain ? What shall the maintenance organisation do if the owner wants to get hold of his part (eventually to make an expertise) ? What shall the authority do if they discover such part ? Can they ask for the part to be mutilated or even can they mutilate it themselves ?	When a component is found unserviceable it is either sent back to the supplier or sent for repair. There is no need for the independent mechanic to keep such part. No text change.
M.A.504 (c)	Martin Ambrose, ERA	079	The term “certified life limit” used in the first line of this paragraph differs from the terminology used consistently elsewhere in Part M. This should be amended to read “service life limit”.		Clarified in AMC. No text change.
M.A.504 (d)	Europe Air Sports	73	Delete	See comment above for part (b) of this subpart.	Standard engineering practices require identification and control of unserviceable components. No text change.
M.A.504 (d) (2)	Martin Ambrose, ERA	079	In complying with this instruction to “mutilate” any components, the organisation would negate the last sentence of paragraph M.A.504 (c) that caters for life limit extensions or repair solutions being approved. Can this be removed?		No contradiction as the mutilation occurs only before relinquishing responsibility. If the component is kept in a secure facility then it can wait a possible life limit extension or repair solution. No text change.
M.A.504 (e)	Finnair Oyj Technical Services	072	Should be allowed also for Part 145 organisations for training purposes.		Text changed.
M.A.504 (e)	AEA Brussels	020	“managed in a controlled manner...”. This needs an explanation.		Text changed.
M.A.601	CAA UK	123	Replace the word ‘changing’ with ‘varying’		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.601	H.T. Beekelaar, Martinair	008	Subpart F.1 not applicable for ECAR 145 organizations since ECAR 145 requirements include and exceed the requirements of Subpart F.1. However this statement is not in Subpart F.1.		Subpart F criteria does not apply to Part-145. Already stated in M.A.201. No text change.
M.A.601	CAA Norway	131	<u>It is in our opinion necessary to deal with the maintenance in light aviation, and that gliders and balloons in particular, in a separate, customized manner. We therefore strongly recommend for a separate category of light aircraft, less than 2000 kg MTOW (structural mass for balloons) used for non-commercial purposes, are mentioned explicitly in the regulation. This category should not be regulated by EASA other than in a general framework, and left for detailed regulation to National Authorities.</u>		It is not compulsory to use Subpart F maintenance organisations to maintain aircraft, the owners of such aircraft can choose. No text change.
M.A.601	Danish Soaring Association	180	It is understood from subparts F,G,H and I that only a Subpart G "continuing Airworthiness Management Organisation" can issue an authorisation or recommendation for continuing airworthiness. This applies to all aircraft covered by IR-M, light aircraft, heavy aircraft, glider, commercial or non-commercial. It is understood from subparts F and H that only a Subpart F "Maintenance Organisation" can issue a certificate of release to service (except for so-called "limited pilot-owner maintenance"). This applies to all aircraft covered by IR-M; light aircraft, heavy aircraft, glider, commercial or non-commercial. For gliders in particular, this is a severe tightening of regulations, because in most European countries, Sailplane Technicians (or othe equivalent national ratings) have been permitted to certify that a glider is released to service, based on their personal license and not necessarily on the approval or an organisation.		It seems that there is a misunderstanding: for instance light aircraft can be maintained and released to service by licensed engineers (M.A.801 (b) 2). No text change.
M.A.601	Martin Ambrose, ERA	079	At previous meetings with the Core groups and the JAA, we were advised that this entire Subpart was applicable only to aircraft not associated with commercial air transport and /or light aircraft. Can the agency please confirm that this is indeed the case?		Scope is defined in M.A.201. No text change.
M.A.601	Michael Loges, Rolls-Royce, Germany	062	Maintenance Organization requirements should be in total included in Part 145 with reduced requirements for organizations maintaining small and non-commercial used aircraft. This will avoid double regulation of similar issues and different instructions. Many of the related organizations obtained a JAR 145 approval in the past and maintain components used in small and large aircraft, commercially or non-commercially. It also will support the change of approval when the organization is growing and tries to follow market demands.		Two thirds of all maintenance organisations in the EU are not JAR 145 approved. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.601	LFV, Sweden	105	It must be possible for a one-man organisations to be approved to perform certain limited maintenance work (Subpart F) and also perform airworthiness reviews for non-commercial aircraft for continued validity of the Certificate of airworthiness (Subpart G). There are in Sweden about 25 such one-man organisations today that have national Repair Station Certificates (Auktoriseringsbevis, AUB) issued under national regulations. These are very limited in scope e.g privilege to approve TBO extensions or perform corrosion controls of piston engines for private operators but some of them also have other specified scope of work. About 80% of all renewals of C of A in Sweden are done based on an « Underhållsrapport » similar to the Subpart I airworthiness review certificate recommendation in M.B.902 and these recommendations are today done by individuals holding maintenance licences. For these organisations there is a need for adjustment of certain paragraphs in Part M and/or guidance material to make it clear that th		This is possible. AMC provides provisions to combine functions. No text change.
M.A.602	IVW, The Netherlands	99	CAA-NL Suggests to expand this paragraph with the following: “, and shall include the information required by M.A.604 and the terms of approval requested to be issued under M.A.603. ”		Text is consistent with Part-145. No text change.
M.A.602	IVW, The Netherlands	99	CAA-NL suggest to include a new paragraph on “ Issue of Maintenance Organisation Approval ” along the lines of Part 21A.135		Text is consistent with Part-145. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.603	Europe Air Sports	73		<p>It is understood from subparts F, G, H and I that only a Subpart G "Continuing Airworthiness Management Organisation" can issue an authorisation or recommendation for continuing airworthiness, and that from subparts F and H that only a Subpart F "Maintenance Organisation" can issue a certificate of release to service (except for so-called "limited pilot-owner maintenance").</p> <p>These proposed rules apply to all aircraft covered by IR-M : light aircraft, heavy aircraft, gliders, commercial or non-commercial.</p> <p>For gliders in particular, these are a severe tightening of regulations, because in most European countries, Sailplane Technicians (or other equivalent national ratings) have been permitted to authorise or recommend continued airworthiness, and have been permitted to certify that a glider is released to service, based on their personal license and not necessarily on the approval of an organisation. The gliding world has functioned quite satisfactorily over many years, in terms of airworthiness and maintenanc</p>	<p>It seems that there is a misunderstanding: for instance light aircraft can be maintained and released to service by licensed engineers (M.A.801 (b) 2). No text change.</p>
M.A.603 (b)	Loganair Glasgow	96	Clarify ' a restricted range of parts'.		AMC defines restricted range of parts.
M.A.603 (a)	Europe Air Sports	73		<p>Paragraphs 11 and 13 do not exist in Appendix 4. Also table 1 does not exist in Appendix 4.</p> <p>It is impossible to properly comment without these paragraphs and tables being present and it is therefore imperative that the tables are presented and a suitable consultation period is allocated in order to consider the implications for air sport aircraft, gliders and balloons.</p>	Text harmonised with Part-145.
M.A.603 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.603 (a) to: "...of a certificate (included in Appendix 5) by the ..."	Wrong reference	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.603 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.603 (a) to: "The Appendix 5 to this Part explains all classes and ..."	Wrong reference, no table in Appendix 5.	Text harmonised with Part-145.
M.A.603 (a)	CAA UK	123	(Appendix 4) should read (appendix 5) in first sentence.		Text changed.
M.A.603 (a)	CAA UK	123	The wording '..contains a table of all..' should be replaced with '..defines the..'		Text changed.
M.A.603 (a)	CAA UK	123	Appendix 4 of IR-M is not consistent with appendix 2 of IR-145. As they are the same, they should be reviewed to be consistent where applicable.		Text harmonised with Part-145.
M.A.603 (b)	LBA	57	AMC material is needed. The Part 145 material should be referenced.		AMC has been produced. No text change.
M.A.603 (b)	T. M. Gonzalez, Pratt & Whitney	084	b) An approved maintenance organisation may fabricate, in conformity with maintenance data, a restricted range of parts for the use in the course of undergoing work within its own facilities, as identified in the maintenance organisation manual <u>based upon part criticality, data sufficiency, fabrication quality control system, including subcontractors, and regulatory oversight.</u> Comment: We believe that this is a critical section that needs more definition, particularly in light of the fact that the FAA is reviewing and proposing a reformulation of its rules on parts created during maintenance. This is a section that should be targeted for harmonization as repairs and used part sales are international in scope and execution. The use of AMC or guidance material may be the more appropriate format to provide this enhanced definition.		Harmonisation is not dealt with by this Part. (See CRD on Regulation). No change.
M.A.603 (b)	DGAC, France	162	I - Amend the proposed text to read: “(b) By derogation to Part 21 annexed to Commission Regulation laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production organisations, and in accordance with appendix XX, an approved maintenance organisation may, as identified in the maintenance organisation manual and in conformity with maintenance data: fabricate for the use in the course of undergoing work within its own facilities, reproduce a restricted range of parts to replace unserviceable or unsalvageable parts provided by a customer, provided the original part is mutilated in a manner that ensures that it is beyond economic salvage or repair.”	Implementation problem For the replacement of parts for which spares are not available it is usually accepted to authorise limited manufacturing activities by the maintenance organisation (see JAA TGL 9). It is necessary to provide for the replacement of parts provided by a customer, for aircraft maintained outside approved organisations by independent mechanics.	This is not a derogation from Part-21. Part-21 explicitly authorises this. Furthermore, no EASA Form 1 is issued as this is for internal use. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			II – Add the attached appendix: 1.		
M.A.603 (b)	Aerospace Industries	170	Revise as follows: (b) An approved maintenance organisation may fabricate, in conformity with maintenance data, a restricted range of parts for the use in the course of undergoing work within its own facilities, as identified in the maintenance organisation manual based upon part <u>criticality, data sufficiency, fabrication quality control system, including subcontractors, and regulatory oversight.</u> <i>Comment: We believe that this is a critical section that needs more definition, particularly in light of the fact that the FAA is reviewing and proposing a reformulation of its rules on parts created during maintenance. This is a section that should be targeted for harmonization as repairs and used part sales are international in scope and execution. The use of AMC or guidance material may be the more appropriate format to provide this enhanced definition.</i>		Harmonisation is not dealt with by this Part. (See CRD on regulation). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.604	Europe Air Sports	73	These provisions require complete re-writing to be acceptable for the gliding community. They are also “over the top” for light aircraft.	<p>Combined with the observation to M.A.603 above, these rules impose a severe increase of requirements for glider maintenance, with respect to personnel and staffing, facilities (in particular office facilities), and paperwork.</p> <p>These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.</p> <p>This subpart should allow for simpler procedures for gliders, in particular the option for Sailplane Technicians (or other equivalent national ratings) to issue certificates of release to service for gliders, based on their personal licence and not necessarily on the approval of an organisation.</p>	<p>The regulation defines large aircraft. This has been done as the continuing airworthiness requirements for light aircraft are much less stringent. They correspond to the minimum requirements set forth by ICAO:</p> <ul style="list-style-type: none"> - The Subpart G organisation is not compulsory for the management of aircraft and replaces the competent authority for the airworthiness review. - The Subpart F organisation is not compulsory except for components. <p>A simple aircraft can according to Part-M be maintained by a licensed engineer with tools, facilities and data which do not have to be individually owned.</p> <p>The competent authority is designated by the member state according to M1. A Member State may nominate an NGB or an other organisation as the competent authority for certain aircraft.</p> <p>No text change.</p>
M.A.604	Danish Soaring Association	180	Combined with the observation no. 2 above, these rules imply a severe increase of requirements for glider maintenance; w.r. to personnel and staffing, facilities (in particular office facilities), and paperwork. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind. This subpart should allow for simpler procedures for gliders, in particular the option for Sailplane Technicians (or other equivalent national ratings) to issue certificates of release to service for gliders, based on their personal license and not necessarily on the approval of an organisation.		<p>It seems that there is a misunderstanding: for instance light aircraft can be maintained and released to service by licensed engineers (M.A.801 (b) 2).</p> <p>No text change.</p>
M.A.604	Jim Gibbons, KLM Engineering	130	(5) a reference to an approved list of certifying staff: . Reason for change: Large operators employ several thousand certifying staff any list would constantly require amending and require constant revisions of the Maintenance Organisational Manual.		<p>Subpart F does not concern operators. This sort of information is given in AMC.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.604	Michel Ducamp FNAM France	171	The maintenance organisation manual and its <u>amendment procedure</u> shall be approved by the competent authority. Minor amendments should not require action from the Authority.		Covered in M.B.606. No text change.
M.A.604	ENAC, Italy	102	A provision shall be added to deal with changes other than exposition amendments, in a way similar to 145.B35.		Covered in M.A.617. No text change.
M.A.604	Martinair Holland	061	Operators are not given any time to change the Maintenance Management Exposition into a Continuing Airworthiness Management Exposition, a transition period should be given and laid down in the regulations since the companies can only start amending the MOE and / or MME when the ECAR Part including the AMC material are official. In the past it was possible to incorporate the JAR OPS 1 Subpart M MME into the JAR 145 MOE. The ECAR M and ECAR 145 do not clear up if it is possible to incorporate the Part M-G CAME into the Part 145 MOE or the Part M-F MOM. For determining the period of transition consider the following situation exists: The JAR-OPS 1 Subpart M MME is incorporate in the JAR 145 MOE and the JAR 145 does not follow the index of JAR 145 Appendix 2 but uses a cross reference to this appendix 2 and a cross reference to Appendix 1 to AMC-OPS 1.905(a). This also because process to amend JAR-OPS Subpart M is not started yet, meaning the MME is still required for an operator to comply with JAR-OPS.		Subpart F does not concern commercial operators. No text change.
M.A.604 (b)	DGAC, France	162	“(b) The maintenance organisation manual and its amendments procedure shall be approved by the competent authority..”	<u>Implementation problem</u> : Not all amendments need to be approved. Paperwork should be reduced to the essential in order to facilitate the work of the industry and better allocate authority's resources.	Covered in M.B.606. No text change.
M.A.605	Europe Air Sports	73		See comments above. These proposed rules are simply unrealistic for the majority of gliders and many light aircraft, and unnecessary, though the general intent of having some “order and organisation” of work is recognized	These requirements do not seem unrealistic and are absolutely necessary for certain maintenance tasks on composites gliders. No text change.
M.A.605 (a)	CAA UK	123	Ensure protection from contamination <u>and the environment</u>		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.605 (c)	ENAC, Italy	102	Requirement in M.A.605 "Facilities" point (c) "...storage conditions shall be in accordance with manufacturer's instructions..." shall be coordinated with a Part 21 requirement for the manufacturers to provide such instructions together with the parts (for example on the EASA Form One). Otherwise this requirement may become impossible to be fulfilled by most Subpart F maintenance organisations. Jar145 standardisation experience has showed that this requirement is difficult to be complied with even by the larger JAR145 organisations due to the difficulty to obtain storage instructions by all the relevant manufacturers.		No change. This issue will need to be addressed by EASA in the future.
M.A.606	Europe Air Sports	73		(g) specifies that certifying staff must comply with requirements of part 66. IR Part 66, Subpart B para 66.A.75 (General) states that "until such time as ECAR-66 specifies a requirement for certifying staff of aircraft other than aeroplanes and helicopters, certificates may be issued on the basis of the applicable national regulations....." Subject to what is concluded in respect of 66.A.75, for glider maintenance this could create a terminal problem, because Sailplane Technicians (or other equivalent national ratings) do not normally have JAR (IR-Part) 66 certificates/licences. Grandfather rights for the present people are not sufficient; future people need to be treated similarly if gliding is to survive. Because this IR-66 does not seem not have a direct implication on the privilege of issuing a "Certificate of Release to Service" in accordance with IR-M, there is a need to have a similar statement in IR-M subpart F	66.A.75 has been changed.
M.A.606	Aircraft Electronics Association	152	Section M.A. 606 should include a note that the persons and positions identified in Section M.A. 606 may be held by a single person. Many small general aviation organizations, which are who Part M was intended to address, have few employees and management personnel must often assume multiple rolls and responsibilities.		Covered by the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.606	Jim Gibbons, KLM Engineering	130	(d) The organisation must have appropriate staff for the normal expected contracted work. The use of temporarily sub-contracted staff is permitted in the case of higher than normally expected contracted work This paragraph is too restrictive. Companies have found it makes increase business sense to meet changes in maintenance requirements by employing temporary staff. This includes employing staff that would be expected to issue a CRS. Provided proposed contracted staff are the subject of stringent background research and ensuring that they meet JAR 66 (ECAR 66) recency requirements. Contracted staff should only be used for certification privileges provided they meet the requirements to hold a company authorisation on the aircraft type for which certification is sought.		In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. No text change.
M.A.606	Richard A. Peri Aircraft Electronics Association	EASA _ comment t MA403(f	Section M.A. 606 should include a note that the persons and positions identified in Section M.A. 606 may be held by a single person. Many small general aviation organizations, which are who Part M was intended to address, have few employees and management personnel must often assume multiple rolls and responsibilities.		Covered by the AMC. No text change.
M.A.606	Baines Simmons Limited	116	Propose new sub-paragraph (h) to address Human Factors risks in maintenance similar to those implemented in Part 145. Research by David Stephens supervised by Professor James Reason (1995-1996) showed that light aircraft are significantly less resistant to Human Error justifying a wider application of Human Factors principles. This applies equally to component maintenance staff. Suggested new text. (h) All personnel involved in Maintenance or Management shall be competent in the application of Human Factors and Human Performance issues appropriate to that persons function in the organisation.		This subject is already covered in the basic license requirement for staff certifying outside the Part-145 environment. No text change.
M.A.606 (c)	LBA	57	M.A.606 Personnel requirements para. (c) should receive a statement to whom nominated persons shall demonstrate relevant knowledge and appropriate experience !		Text changed.
M.A.606 (c)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.606 (c) to: "... experience related to aircraft and/or component ..."	Certifying staff need in many cases relevant knowledge and appropriate experience in both, aircraft and component maintenance.	Text changed.
M.A.606 (c)	Mike Newman, ALAE	009	Add new sentence after existing sentence, "such persons must be acceptable to the competent Authority".		Accepted via the MOM. No text change.
M.A.606 (c)	P. Doyer, AEI	034	Add new sentence after existing sentence, "such persons must be acceptable to the competent Authority".		Accepted via the MOM. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.606 (d)	LBA	57	The requirement is more restrictive than 145.A.30(d). The requirement of 145.A.30(d) should be used. For a small maintenance organisation it is not possible, to have all certifying staff employed on a full time basis.		In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis, as detailed in AMC. No text change.
M.A.606 (d)	RAES	107	We are gravely concerned by paragraph M.A.606 (d) and in particular the restrictions placed on which staff may issue a certificate of release to service. We believe that this will be restrictive to the point of becoming impractical as it will prohibit the use of validated engineers holding company approvals. This would impact heavily on smaller maintenance companies in particular. We suggest that the phrase, "and only for personnel not issuing a certificate of release to service" be omitted from the final sentence.		In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis, as detailed in AMC. No text change.
M.A.606 (d)	Royal Aeronautical Society	182	We are gravely concerned by paragraph M.A.606 (d) and in particular the restrictions placed on which staff may issue a certificate of release to service. We believe that this will be restrictive to the point of becoming impractical as it will prohibit the use of validated engineers holding company approvals. This would impact heavily on smaller maintenance companies in particular. We suggest that the phrase, "and only for personnel not issuing a certificate of release to service" be omitted from the final sentence.		In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis, as detailed in AMC. No text change.
M.A.606 (d)	DGAC, France	162	"(d) The organisation shall have appropriate staff for the normal expected contracted work. The use of temporarily sub-contracted staff is permitted in the case of higher than normally expected contracted work and for the start of a new scope of work and only for personnel not issuing a certificate of release to service ."	Implementation problems: The fact that the staff is sub-contracted is not the major point, but rather the fact that the staff is only employed temporarily, whatever the nature of the contract. Temporary staff may also be needed when starting a new scope of work and the organisation employs for a short term experienced staff to second the organisation's normal staff. There is no reason why such staff could not be permitted to issue certificates of release to service as, according M.A.606(g), they shall comply to Part 66 requirements and in addition, according to M.A.607(a), they shall have recent experience and adequate understanding of the aircraft and the associated organisation procedures, which means	In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis, as detailed in AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				that they will only be authorised by the organisation if they are technically competent and able to follow the procedures. This is specially necessary when a normal staff has to be replaced because of illness or accident.	
M.A.606 (d)	CAA UK	123	It is recommended that contracted staff be allowed to issue CRS to make the requirement no more restrictive than the equivalent requirement in IR145.		In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis, as detailed in AMC. No text change.
M.A.606 (e)	P. Doyer, AEI	034	Add sentence after existing sentence, "This requirement will also include any sub contracting staff being used and their qualifications to be recorded and retained by the Organization".		Already covered by existing text. No text change.
M.A.606 (e)	Mike Newman, ALAE	009	Add sentence after existing sentence, "This requirement will also include any sub contracting staff being used and their qualifications to be recorded and retained by the organisation".		Already covered by existing text. No text change.
M.A.606 (f)	IVW, The Netherlands	99	CAA-NL is unclear what the official recognised standard is in this case, officially recognised by whom? Either the Agency should clarify this in AMC material, or CAA-NL suggests that "an officially recognised standard" will be replaced by " a standard recognised by the competent authority ".		Defined in the AMC. No text change.
M.A.606 (f)	LFV, Sweden	105	Where "an officially recognised standard" is mentioned in the text it should be added: "or national regulations" Guidance material required ensuring that "an officially recognized standard" has a definition. During nearly all MAST visits, this has been a very controversial issue. It is		Defined in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			suggested to at least refer to some existing standards that are available and used by the industry or even current national regulations.		
M.A.606 (f)	CAA UK	123	For clarity, add after "qualified" the words ".to a standard recognised by the competent authority.", replacing the existing text		Clarified in the AMC. No text change.
M.A.606 (g)	LBA	57	Which qualification for certifying staff is required? (CAT C, CAT B??). It is not mentioned anywhere. Add additional requirements that reflect the meaning of Part 145.A.30(g)+(h).		Text clarified in 66.A.20(a). No change in Part-M.
M.A.606 (g)	Danish Soaring Association	180	Specifies that certifying staff must comply with requirements of part 66. For glider maintenance, this is a severs problem, because Sailplane Technicians (or other equivalent national ratings) do not normally have Part 66 certificates/licenses. Previous versions of ECAR-M contained a statement that "until such time as ECAR-66 specifies a requirement for certifying staff of aircraft other than aeroplanes and helicopters, the relevant Member State regulations applies". This statement has been removed from the present IR-M draft, but should be re-instated. (It is noted that ECAR-66 draft 4.3 Subpart B "Aircraft other than aeroplanes and helicopters" contains as its only statement: "Until such time as ECAR-66 specifies a requirement for certifying staff of aircraft other than aeroplanes and helicopters, the relevant Member State regulation applies". However, because this ECAR-66 statement does not seem to have a direct implication on the privilege of issuing a "Certificate of Release to Service" i.a.w		66.A.75 has been changed.
M.A.607	AOPA	141	(a) In addition to M.A.606(g), certifying staff can only be authorised to issue a certificate of release to service, if the organisation has ensured: 1. that certifying staff can demonstrate that in the preceding two-year, period they have had six months of relevant maintenance experience either on the specific aircraft, either on equivalent types of aircraft. 2.that certifying staff have an adequate understanding of the relevant aircraft and/or types of similar aircraft and/or aircraft component(s) to be maintained together with the associated organisation procedures.	Implementation problem: Restricting (1) and (2) to a specific aircraft ("relevant" word) would lead to a disaster in General Aviation Maintenance. <i>In many cases, a PART-F organisation maintains only once a year a specific aircraft, just because it flies less than 50 hours a year.</i> <i>For that reason, the relevant experience should be within types of aircraft having similar characteristics, like engines and/or similar airframes and/or similar components and/or similar materials (wood, plastic, ...).</i>	The term "relevant" provides flexibility as defined in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.607	Mr Cartry	173	When <u>a light aircraft</u> is grounded at a location other than the main base, where no appropriate certifying staff is available, we understand that a person with an appropriate ECAR 66 licence can do all the limited maintenance listed in appendix 8 Limited Pilot Owner Maintenance. Has this case to be reported to the competent authority ?		This is not linked to pilot owner maintenance. This is linked to the approved organisation that has an aircraft under contract an that needs one time maintenance in an unusual place. This maintenance could be quite major. No text change.
M.A.607	Fédération Française de vol en voile	026	When <u>a light aircraft</u> is grounded at a location other than the main base, we understand that a person with an appropriate ECAR 66 licence can do all the limited maintenance listed in appendix 8 Limited Pilot Owner Maintenance. Has this case to be reported to the competent authority?		This is not linked to pilot owner maintenance. This is linked to the approved organisation that has an aircraft under contract an that needs one time maintenance in an unusual place. This maintenance could be quite major. No text change.
M.A.607	Fédération Française de vol en voile	039	When <u>a light aircraft</u> is grounded at a location other than the main base, where no appropriate certifying staff is available, we understand that a person with an appropriate ECAR 66 licence can do all the limited maintenance listed in appendix 8 Limited Pilot Owner Maintenance. Has this case to be reported to the competent authority ?		This is not linked to pilot owner maintenance. This is linked to the approved organisation that has an aircraft under contract an that needs one time maintenance in an unusual place. This maintenance could be quite major. No text change.
M.A.607 (b)	Loganair Glasgow	96	Do not agree with philosophy of re-checking. If it likely to be wrong then engineer should not be allowed to certify.		This is an existing JAR 145 requirement which is also applicable in the Subpart F environment. No text change.
M.A.607 (a)	Fédération Française de vol en voile	026	6 months during the last 2 years is large for light piston engined aircraft. We propose 6 months during the last 4 years.		No justification for the increased flexibility. Not compliant with ICAO Annex 1. No text change.
M.A.607 (a)	IVW, The Netherlands	99	CAA.NL suggests to include the text of Part 145.A.35(b) into this paragraph.		145.A.35(b) provisions do not apply as no certification authorisation is issued. Certifying staff release under their licenses and privileges are defined by 66.a.20 (a). M.A.607(a) clarified.
M.A.607 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.607 (a) to: "Certifying staff can only be authorised to issue a certificate of release to service, if they fulfil the prerequisites of M.A.606(g) and if the organisation has ensured: "	It should be made clear that the prerequisites of M.A.606(g) are referenced.	M.A.606(g) applies to the organisation and cannot be a prerequisite for the individual. No text change.
M.A.607 (a)	Mr Cartry	173	6 months during the last 2 years is large for light piston engined aircraft. We propose 6 months during the last 4 years.		No justification for the increased flexibility. Not compliant with ICAO Annex 1. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.607 (a)	Danish Soaring Association	180	<p>The requirement that certifying staff must demonstrate 6 months maintenance experience within the preceeding 2 years, is unnecessary strict for glider maintenance, and introduces to problems:</p> <p>1)It might imply that newly licensed technicians can not issue certificates of release to service until 6 months after receiving the license.</p> <p>2) Volunteer (unpaid) maintenance personnel typical for gliding, it may be very difficult to comply with this rule, particularly if the 6 months is reckoned as an equivalent in working house based on the normal monthly working hours of a paid employee. This requirement has not also new, relative to previously reviewed drafts.</p> <p>This requirement should be removed, or an exception made for "aircraft other than aeroplanes and helicopters".</p>		<p>1) Text changed.</p> <p>2) 6 months of relevant maintenance experience is deemed to give flexibility and not be overly restrictive.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.607 (a)	Europe Air Sports	73	Remove the rules for gliders and some light aircraft	<p>(a)-1: The requirement that certifying staff must demonstrate 6 months' maintenance experience within the preceding 2 years, is unnecessary strict for glider maintenance, and introduces two problems: It might imply that newly licensed technicians cannot issue certificates of release to service until 6 months after receiving the license.</p> <p>(a)-2 For volunteer (unpaid) maintenance personnel typical for gliding, it would be impossible to comply with this rule, particularly if the 6 months is reckoned as an equivalent in working hours based on the normal monthly working hours of a paid employee. This requirement is also new, relative to previously reviewed drafts in ECAR-M.</p> <p>This requirement should be removed, or an exception made for "aircraft other than aeroplanes and helicopters"</p> <p>(b) The rules concerning maintenance at locations other than the main base appear to be unnecessarily strict and detailed. These rules were not present in previously reviewed ECAR-M drafts. It is proposed that these rules should be removed</p>	<p>(a)-1 Text changed.</p> <p>(a)-2 6 months of relevant maintenance experience is deemed to give flexibility and not be overly restrictive. No change.</p> <p>(b) This paragraph is an alleviation. If removed, it will decrease flexibility. No change.</p> <p>(c) Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: -> If the competent authority finds that these aircraft cannot conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M. -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply.</p>
M.A.607 (a) (1)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.607 (a) (1) to: "...preceding two-year, period they have had six months of relevant maintenance experience; and 2. that certifying staff have ..."	Change text in M.A.607 (a) (1) to: "...preceding two-year, period they have had six months of relevant maintenance experience; and 2. that certifying staff have ..."	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.607 (b)	DGAC, France	162	“(b) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the maintenance organisation contracted to provide maintenance support may issue a one off certification authorisation: (i) to one of its employees holding type qualifications on aircraft of similar technology, construction and systems; or (ii) to any person with not less than 5 years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisation appropriately approved under this Part at that location and the contracted organisation obtains and holds on file evidence of the experience and the licence of that person. All such cases must be reported to the competent authority within seven days of the issuance of such certification authorisation. The approved maintenance organisation issuing the one off certification authorisation shall ensure that any suc	Implementation problem: The word “grounded” may be misleading. The Maintenance organisation should only be responsible for its own employees. When the aircraft is maintained outside the organisation, the maintenance organisation may even not be informed and it seems more appropriate for the person responsible for the continuing airworthiness management to take responsibility. Note: see also comment to M.A.801	It is true that an owner may decide not to inform the Subpart F organisation and use other engineers, but he will not be able to use non-Part-66 qualified engineers and will lose the benefit of a 3 year ARC. No text change.
M.A.607 (b)	Danish Soaring Association	180	The rules concerning maintenance at locations other than the main base appear to be unnecessarily strict and detailed. These rules were not present in previously reviewed ECAR-M drafts. It is proposed that these rules should be removed.		This paragraph is an alleviation. If removed, it will decrease flexibility. No text change.
M.A.607 (b)	Jean-Francis Suquet, Eurocopter	004	In the following unforeseen cases, where an aircraft is at a location other than the main base where no appropriate certifying staff is available, the maintenance organisation contracted to provide maintenance support may issue a one off certification authorisation.	Even if the aircraft is not grounded, we may meet the case of a lack of certifying staff to carry out a maintenance away from the base location. In such a case, there is a need to issue an exceptional authorisation under the same conditions as described in paragraph M.A.607(b).	Exemptions are only for unforeseen cases. No text change.
M.A.607 (c)	AEI	034	Add sentence after existing sentence, “including certifying staff employed under a sub contracting agreement”.		Contracted personnel cannot issue CRS. No text change.
M.A.607 (c)	Mike Newman, ALAE	009	Add sentence after existing sentence, “including certifying staff employed under a sub contracting agreement”.		Contracted personnel cannot issue CRS. No text change.
M.A.608	Europe Air Sports	73	For individuals something simpler should be considered, such as <u>“the person undertaking the maintenance should ensure that he has tools available which are suitable for the work and that tools which require calibration are calibrated to relevant official standards.”</u>	This proposed rule may be applicable to a commercial maintenance organisation, but is inappropriate for an individual, even where the individual is working under an authorisation or approval from the organisation, but remotely from its base.	Subpart F is about an organisational approval. No text change.
M.A.608	LBA	57	AMC material for alternative equipment and tools is needed.		Text changed.
M.A.608	CAA UK	123	Recommend adding a new paragraph (c) ‘All components must be inspected on receipt’.		Text changed, although not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.608 (a) (1)	T. M. Gonzalez, Pratt & Whitney	084	1. hold the equipment and tools, <u>or the verified equivalents thereto as determined by the maintenance organizations procedures</u> , specified in the M.A.609 maintenance data as necessary for day-to-day maintenance within the scope of the approval. <i>Comment: Equivalent tools should be provided for.</i>		Text changed.
M.A.608 (a) (1)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.608 (a) (1) to: “...day-to-day maintenance within the scope of the approval; and 2. demonstrate that it has access ...”	It should be made clear that both, subparagraphs 1 and 2 apply (not subparagraphs 1 or 2).	Text changed.
M.A.608 (a) 1	Aerospace Industries	170	Revise as follows: 1. hold the equipment and tools, <u>or the verified equivalents thereto as determined by the maintenance organizations procedures</u> , specified in the M.A.609 maintenance data as necessary for day-to-day maintenance within the scope of the approval. <i>Comment: Equivalent tools should be provided for.</i>		Text changed.
M.A.608 (b)	LFV, Sweden	105	Where “an officially recognised standard” is mentioned in the text it should be added: “or national regulations” Guidance material required ensuring that “an officially recognized standard” has a definition. During nearly all MAST visits, this has been a very controversial issue. It is suggested to at least refer to some existing standards that are available and used by the industry or even current national regulations.		See CRD on regulation. No text change.
M.A.609	Aircraft Electronics Association	152	Throughout these regulations, it has been clear that maintenance data must be available and current when required for use by the maintenance task. However, M.A. 609 failed to carry that philosophy over from Part 145. Part M should maintain that consistent language. Recommend Change: Amend section M.A.609 to read: “The approved maintenance organization shall hold and use applicable current maintenance data specified in M.A. 402 in the performance of maintenance including modifications and repairs. Maintenance data must be available and current when work is being performed. In the case of customer provided maintenance data, it is only necessary to have such data when the work is in progress.”		AMC clarifies the issue. No text change.
M.A.609	DGAC, France	162	“The approved maintenance organisation shall hold and use applicable current maintenance data specified in M.A.402 in the performance of maintenance including modifications and repairs. In the case of customer provided maintenance data specific maintenance data provided by the customer, it is only necessary to have such data when the work is in progress”	<u>Editorial:</u> To make it more explicit that it would not be acceptable to have an organisation with no maintenance data at all. The organisation must have the basic data, but may use occasionally specific data (attached to an STC for example)	AMC clarifies the issue. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.609	Aerospace Industries	170	<p>Revise as follows: The approved maintenance organisation shall hold and use applicable current maintenance data specified in M.A. 402 in the performance of maintenance including modifications and repairs. In the case of customer provided maintenance data, it is only necessary to have such data when the work is in progress completed.</p> <p><i>Comment: Work is often begun for schedule reasons before final customer maintenance data is received. To begin prior to receipt is a commercial risk while to deliver an item that is not in conformance with the proper maintenance data is a regulatory violation. We believe that this change will allow a viable commercial practice without affecting the regulatory status of the part.</i></p>		Applicable maintenance data must be available prior to commencement of work. No text change.
M.A.609	Richard A. Peri Aircraft Electronics Association	EASA _ comment MA609	<p>Throughout these regulations, it has been clear that maintenance data must be available and current when required for use by the maintenance task. However, M.A. 609 failed to carry that philosophy over from Part 145. Part M should maintain that consistent language.</p> <p>Recommend Change: Amend section M.A.609 to read: "The approved maintenance organization shall hold and use applicable current maintenance data specified in M.A. 402 in the performance of maintenance including modifications and repairs. Maintenance data must be available and current when work is being performed. In the case of customer provided maintenance data, it is only necessary to have such data when the work is in progress."</p>		AMC clarifies the issue. No text change.
M.A.609	T. M. Gonzalez, Pratt & Whitney	084	<p>The approved maintenance organisation shall hold and use applicable current maintenance data specified in M.A. 402 in the performance of maintenance including modifications and repairs. In the case of customer provided maintenance data, it is only necessary to have such data when the work is in-progress <u>completed</u>.</p> <p><i>Comment: Work is often begun for schedule reasons before final customer maintenance data is received. To begin prior to receipt is a commercial risk while to deliver an item that is not in conformance with the proper maintenance data is a regulatory violation. We believe that this change will allow a viable commercial practice without affecting the regulatory status of the part.</i></p>		Applicable maintenance data must be available prior to commencement of work. No change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.610	Manfred Bialonczyk, BMVIT	081	In M.A. 610 change the word "customer" to "owner"	According M.A. 201(a) is the owner responsible for the continued airworthiness.	Customer is a generic term that covers all cases. No text change.
M.A.611	Hugo Spruyt Belgian Civil Aviation Authority	016	Modify the text as follows: All maintenance shall be carried out in accordance with the requirements of M.A. Subpart D and the maintenance organisation manual, at all times	In our view, the statement in M.A. 604, (a), 1, is not sufficient to put a legally binding obligation on the organisation to use the manual.	The MOM is signed by the accountable manager, therefore it is legally binding. No text change.
M.A.612	Europe Air Sports	73		In order to limit the amount of paperwork, a written entry in the aircraft technical logbook should be acceptable for simpler maintenance tasks.	This is already feasible. No text change.
M.A.612	Fédération Francaise de vol en voile	026	We understand that a CRS has to be issued at each maintenance operation. For <u>a light aircraft</u> is the inscription in the log book sufficient?		Yes. No text change.
M.A.612	Mr Cartry	173	We understand that a CRS has to be issued at each maintenance operation. For <u>a light aircraft</u> is the inscription in the log book sufficient?		Yes. No text change.
M.A.612	Fédération Francaise de vol en voile	039	We understand that a CRS has to be issued at each maintenance operation. For <u>a light aircraft</u> is the inscription in the log book sufficient?	To decrease the number of paper.	Yes. No text change.
M.A.612 (b)	LBA	57	There should be a formal statement defined for the RTS (Harmonization in EU) in M.A.801 or an Appendix reflecting the intent as on EASA Form One.		Defined in the AMC. No text change.
M.A.612 (b)	LFV, Sweden	105	The text – "each approved maintenance organization shall produce and use a standardized form for the aircraft certificate of release to service." Guidance material is required for the standardized form for the aircraft CRS.		Text changed.
M.A.613	Europe Air Sports	73	At the completion of <u>required maintenance on components that are designated as safety-critical in the type certificate or equivalent</u> , in accordance with this subpart, a component certificate of release to service, EAS Form 1, shall be issued.	This should exclude non safety-critical instruments and other equipment in gliders.	Components fitted to the aircraft are part of the aircraft and therefore must be released appropriately. No text change.
M.A.613	Loganair Glasgow	96	No provision for in house use of repaired / overhauled / modified components without EASA Form 1 as currently used.		Only applicable in the Part-145 environment. Simplifies management. No text change.
M.A.613 (a)	IVW, The Netherlands	99	CAA-NL suggests to extend the sentence with the following words: "according to M.A.802" , in line with M.A.612(a).		This is not deemed necessary. No text change.
M.A.614	Jim Gibbons, KLM Engineering	130	Current NAA approved methods of Controlling/Maintaining airworthiness compliance records and their back ups should remain acceptable. Companies would have to incur excessive costs if their agreed procedures were changed.		The methods to store data are described in the AMC. They normally encompass existing national practices. No change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.614 (a)		081	Change first sentence of M.A.614 (a) to: "The approved maintenance organisation shall record all details of work carried out."	"out" is missing	Text changed.
M.A.614 (a)	CAA UK	123	Add the word ".out.." after "..work carried.."		Text changed.
M.A.614 (c)	LBA	57	Last sentence: In case that the organisation terminates its operation, a place for storage of the documents needs to be established.		Text changed.
M.A.614 (c)	LBA	57	The definition of maintenance records does not conform with M.A.305 but with 145.A.55. No change should be done to this subparagraph.		Will be defined in AMC. No text change.
M.A.614 (c) 3	CAA UK	123	Add the words "...as specified by the competent authority." Same as Part 145.A.55(c)(3)		Text changed.
M.A.615	DGAC, France	162	" the organisation may: 1. maintain any aircraft and/or component for which it is approved at the locations specified in the approval certificatemaintenance organisation manual. 2. maintain any aircraft and/or component for which it is approved at any other location subject to such maintenance being only necessary to rectify arising defects. 3. issue certificates of release to service, pursuant to paragraphs (a) and (b), on completion of maintenance in accordance with M.A.612 or M.A.613."	Implementation problem; Only the principal place of business is mentioned on the certificate. The locations are mentioned in the manual.	Text changed.
M.A.615	LBA	57	Delete "..., pursuant to paragraph (a) and (b), ..." Justification: There are no subparagraphs (a) and (b) in para 615		Text changed.
M.A.615 (1)	LBA	57	The organisation may: In order to treat maintenance organisations holding a subpart F approval not different to those holding a part 145 approval they should receive more freedom and flexibility for the accomplishment of maintenance activities outside own locations. Therefore a possibility for serving customers outside own locations with more flexibility than changing approval certificates should be added. The paragraph 1. should read: 1. maintain any aircraft and/or component for which it is approved at the locations specified either in the approval certificate and/or in the organisation exposition if accepted by the competent authority.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.615 (3)	Manfred Bialonczyk, BMVIT	081	Reference should be made to paragraphs 1. and 2.	Reference to paragraphs a) and b) is wrong.	Text changed.
M.A.615 (3)	CAA UK	123	To obtain correct reference, replace (a) & (b) with (1) & (2)		Text changed
M.A.616	LBA	57	AMC material is needed for the wording "on a regular basis" to get a common standard. AMC material is needed to define the organisational review.		Developed in AMC. No text change.
M.A.616	Hugo Spruyt Belgian Civil Aviation Authority	016	Add: The competent authority shall define the period between the organisational reviews. The report of these reviews shall be kept by the organisation during a period defined by the competent authority.	Moreover, it's more convenient to precise the person that can perform these reviews and the procedure to be followed. In the other hand, this paragraph should specify that the organisation must keep the records of the review report. Indeed, these records should be very important for the audit survey by the competent authority.	Developed in AMC. No text change.
M.A.617	CAA UK	123	Needs a period for notification of changes. Add to relevant AMC entry		Changes must be notified <u>prior</u> to their implementation. No text change.
M.A.618	DGAC, France	162	Amend the text as proposed and transfer (a) an (b) in section B as conditions for suspension "An approval shall be issued for an unlimited duration. It shall remain valid subject to: (a) the organisation remaining in compliance with this Part, particularly the provisions related to the handling of findings as specified under M.B.605, and; (b) the competent authority being granted access to the organisation to determine continued compliance with this Part, and; (c) the certificate not being until it is surrendered, superseded, revoked, suspended or expired."	Impracticable - According the proposed paragraph (a) 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 ! In addition it is clear that any one has to comply with the regulation. - Paragraph (b) is more appropriate as a condition to suspend the approval. - 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 unlimite	Additional conditions as specified are authority actions and are already covered in M.B.605. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.618 (a)	CAA UK	123	To obtain correct reference, insert "sub" before the word "part".		Compliance with the relevant paragraph of whole Part is required. No text change.
M.A.618 (c)	Manfred Bialonczyk, BMVIT	081	Wording not in line with M.B.603 (a) and Appendix 5.		M.B.603 changed, but not Appendix 5, as it covers both Sections A and B.
M.A.701	CAA UK	123	For clarity, change to word "changing" to "varying"		Text changed, although not as proposed.
M.A.701	FAA USA	174	Suggest information be included as to how such certificates can be obtained in a non-EU Member State who is not a member of EASA. Recommend that the FAA's 14 CFR Part 121.153 (c) be reviewed and considered for comparison and harmonization.		Not applicable to this Part. Bilateral subjects negotiated independently (see regulation CRD).
M.A.701	CAA Norway	131	<u>It is in our opinion necessary to deal with the maintenance in light aviation, and that gliders and balloons in particular, in a separate, customized manner. We therefore strongly recommend for a separate category of light aircraft, less than 2000 kg MTOW (structural mass for balloons) used for non-commercial purposes, are mentioned explicitly in the regulation. This category should not be regulated by EASA other than in a general framework, and left for detailed regulation to National Authorities.</u>		It is not compulsory to use Subpart G maintenance organisations to manage such aircraft, the owners of the aircraft can choose. No text change.
M.A.701	Europe Air Sports	73		Repeat of general comments under M.A. 603 above. There will be considerable overlap in the work required to be carried out by the Subpart G continued airworthiness management organisation and the Subpart F approved maintenance organisation. Owners will have to pay the Subpart G organisation for the work it carries out and will still have to make the statutory payments to the NAA for airworthiness fees etc. The increase in costs associated with the new requirement will be significant for private owners operating aircraft for recreational purposes.	One may be approved for both Subparts F and G. Furthermore, it is not compulsory to use a Subpart F or G organisations for such aircraft, the owners of the aircraft can choose. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.701	Michael Loges, Rolls-Royce, Germany	062	Continuing Airworthiness Management Organizations do not exist in many member states. To set-up and staff these organizations will be not easy and not achievable in due time. In addition it sill add an unknown economical burden to commercial and non-commercial operators without increasing the level of safety but adversely effect the position of European operators against all other operators in the world. The existing national systems for continuing airworthiness have not been seen as an alternative solution. Further is the acceptability under ICAO recommendations for continuing airworthiness fully unclear. The provision for operators to be also the continuing airworthiness management organization for their aircraft is in conflict with other civil legal requirements as the German "Verwaltungs- verfahrensgesetz § 21".		JAR-OPS Subpart M is the common European standard for commercial air transport. Subpart G is a transposition of Subpart M requirements and in general aviation many countries have approved organisations carrying out these tasks whether as part of a maintenance organisation or independently. Subpart G provides alleviations for non-commercial aviation. Finally, in non-commercial aviation it is not compulsory to use Subpart G organisations to manage such aircraft, the owners of the aircraft can choose. No text change.
M.A.701 (b)	Ralph Schütte, Lufthansa Germany	025	Any kind of a physical survey is maintenance per se! This is valid even if it is only the opening/closing of access panels. So it is felt unlogical to oblige the Subpart G organisation to perform a physical inspection. This can only be delegated to a maintenance organisation.		701(b) not found. Furthermore, any kind of physical survey is not necessarily maintenance. Finally the AMC on the issue provides for the necessity to issue a CRS after certain surveys. No text change.
M.A.702	Aerospace Industries	170	Add as a last sentence: <u>The holding of other regulatory certifications shall not prevent an individual or organization from being certified as a continuing airworthiness management organization.</u> <i>Comment: This is a very critical point. A literal interpretation of M.A. 712(d) provides for combination of quality systems for organizations certificated under other Parts although M.A. 706 (e) somewhat restricts Part 145 organization involvement without specific approval to the contrary. Therefore, we believe an affirmative statement that any other Part certification holder can also hold Subpart G certification is necessary. Part M Subpart G and Part 145 organizations, particularly those owned by or affiliated with manufacturers, have a great deal of commonality and are a natural fit, provided that all necessary qualification conditions are met</i>		This is not forbidden. No text change.
M.A.702	LBA	57	A standardisation for the application form would be appreciated. The time limits (sixty, thirty and 10 days) for changes of AOC and personnel should be transferred from JAR-OPS-1 to this paragraph.		This time limits in JAR-OPS are for the OPS manual therefore it is irrelevant. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.702	IVW, The Netherlands	99	CAA-NL Suggests to expand this paragraph with the following: “, and shall include the information required by M.A.704 and the terms of approval requested to be issued under M.A.703. ”		Already covered by Section B. No text change.
M.A.702	IVW, The Netherlands	99	CAA-NL suggest to include a new paragraph on “ Issue of Maintenance Organisation Approval ” along the lines of Part 21A.135		Text is consistent with Part-145. No text change.
M.A.702	Martin Ambrose, ERA	079	Many operators contract a Part 145 approved maintenance organisation to manage their maintenance activities. As such, can the Agency advise if it is permissible for a “Third Party” Part 145 approved organisation to hold a Subpart G approval?		Operators today are not authorised to contract a Part-145 approved maintenance organisation to manage their maintenance activities. They are only authorised to sub-contract. It is not forbidden for a Part-145 organisation to also be approved to Subpart G but this gives no extra privileges for commercial air transport as the cannot be contracted (transfer of responsibility) by an AOC holder for continuing airworthiness. No text change.
M.A.702	T. M. Gonzalez, Pratt & Whitney	084	Add as a last sentence: The holding of other regulatory certifications shall not prevent an individual or organization from being certified as a continuing airworthiness management organization. Comment: This is a very critical point. A literal interpretation of M.A. 712(d) provides for combination of quality systems for organizations certificated under other Parts although M.A. 706 (e) somewhat restricts Part 145 organization involvement without specific approval to the contrary. Therefore, we believe an affirmative statement that any other Part certification holder can also hold Subpart G certification is necessary. Part M Subpart G and Part 145 organizations, particularly those owned by or affiliated with manufacturers, have a great deal of commonality and are a natural fit, provided that all necessary qualification conditions are met.		This is not forbidden. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.703	DGAC, France	162	<p>Replace existing text by :</p> <p>“(ba) For commercial air transport, the approval shall be part of the air operator certificate issued by the competent authority is deemed to be an approval for the continuing airworthiness management of the aircraft operated.</p> <p>(ab) In all other cases, including for commercial operators airworthiness review approval or approval for the continuing airworthiness management of aircraft which are not operated, the grant of approval is indicated by the issue of the certificate included in Appendix 6 by the competent authority.</p> <p>(c) The M.A.704 approved continuing airworthiness management exposition must specify the scope of work deemed to constitute approval.</p>	<p>Basic principles: It has to be perfectly clear that for a commercial air transport operator, the continuing airworthiness management of the aircraft operated is an integral part of the air operator certificate, and thus no additional certificate is necessary. For commercial air transport operator, the AOC cannot be used to give additional approvals related to airworthiness reviews or for assuming continuing airworthiness management responsibilities for someone else, thus an additional certificate has to be granted.</p> <p><i>Note : If the case this comment would be rejected and attachment of Appendix 6, although unnecessary, was required, article 3 of the regulation would need to be amended to add the following provision : “ The original format of the AOC may be used in place of the Part M Appendix 6 format until 28 March 2007.” as today existing AOC do not contain Appendix 6 information.</i></p>	Text changed although not as proposed.
M.A.703 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.703 (a) to: “... by the issue of an EASA Form 14 approval certificate included in Appendix 6 by ...”		This is covered by Section B.
M.A.703 (c)	CAA UK	123	To better explain sub-contracting of certain continuing airworthiness management tasks with regard to commercial air transport, add new paragraph (c) as follows: ‘Any continued airworthiness taks sub-contracted i.a.w. Part M A201 must be clearly identified in a written contract’		This is not relevant to this paragraph. Covered in M.A.711(a)(3) and expanded in AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.704	Europe Air Sports	73		<p>Combined with the observations above, these rules imply a severe increase of requirements for glider and light aircraft maintenance with respect to personnel and staffing, facilities (in particular office facilities), quality assurance and paperwork. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.</p> <p>This subpart should allow for much simpler organisational structures and procedures for gliders and light aircraft.</p> <p>Taking glider maintenance as an example the option for Sailplane Technicians (or other equivalent national ratings) to issue certificates of release to service for gliders, based on their personal license and not necessarily on the approval of an organisation.</p> <p>Although EU regulation 1592/2002 specifies that IR-M as applicable for gliders, this EU regulation does not preclude more relaxed rules (within IR-M) for continuing airworthiness of gliders.</p>	<p>It is not compulsory to use Subpart G maintenance organisations to manage such aircraft, the owners of the aircraft can choose.</p> <p>No text change.</p>
M.A.704	FAA USA	174	<p>There appears to be no requirement to define the CAMO's facility address or "off-site" work locations.</p> <p>Suggest that a facility address and all "off-site" work locations be included in the Exposition.</p>		Text changed.
M.A.704	Martinair Holland	061	<p>Operators are not given any time to change the Maintenance Management Exposition into a Continuing Airworthiness Management Exposition, a transition period should be given and laid down in the regulations since the companies can only start amending the MOE and / or MME when the ECAR Part including the AMC material are official. In the past it was possible to incorporate the JAR OPS 1 Subpart M MME into the JAR 145 MOE. The ECAR M and ECAR 145 do not clear up if it is possible to incorporate the Part M-G CAME into the Part 145 MOE or the Part M-F MOM.</p> <p>For determining the period of transition consider the following situation exists:</p> <p>The JAR-OPS 1 Subpart M MME is incorporate in the JAR 145 MOE and the JAR 145 does not follow the index of JAR 145 Appendix 2 but uses a cross reference to this appendix 2 and a cross reference to Appendix 1 to AMC-OPS 1.905(a).</p>		<p>The CAME is a copy of the MME therefore no change is needed except the chapter on airworthiness review, which is not a compulsory activity. AMC describes all the possible combinations.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			This also because process to amend JAR-OPS Subpart M is not started yet, meaning the MME is still required for an operator to comply with JAR-OPS.		
M.A.704	Danish Soaring Association	180	<p>Combined with the observations above, these rules imply a severe increase of requirements for glider maintenance; w.r. to personnel and staffing, facilities (in particular office facilities), quality assurance and paperwork. These rules appear to have been developed with a relatively large commercial maintenance organisation in mind.</p> <p>This subpart should allow for simpler procedures for gliders, in particular the option for Sailplane Technicians (or other equivalent national rating) to issue certificates of release to service for gliders, base on their personal license and not necessarily on the approval of an organisation.</p> <p>Although EU regulation 1592/2002 specify that IR-M is applicable for gliders, this EU regulation does not preclude more relaxed rules (within IR-M) for continuing airworthiness of gliders</p>		It is not compulsory to use Subpart G maintenance organisations to manage such aircraft, the owners of the aircraft can choose. No text change.
M.A.704 (a) (1)	LBA	57	<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." 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 a item for standardisation.</p>		Text harmonised with Part-145, but not as proposed.
M.A.704 (a) (2)	Warner van der Veer-Jehee, KLM Fleet Services	017	What is the intention of "scope of work", we are talking about a Continuing Airworthiness Management Organisation.		Subpart G organisations do have a scope of work. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.704 (a) 5	Warner van der Veer-Jehee, KLM Fleet Services	017	How do you design a procedure to determine the qualifications of staff. Is that all staff or only senior persons?		This paragraph only asks for a <u>list</u> of airworthiness review staff. No text change.
M.A.704 (a) 6	Warner van der Veer-Jehee, KLM Fleet Services	017	Delete ECAR requirement, is no JAR OPS M requirement and ECAR-M 1,705 is adequate.		This is about a description to be included in the manual, not a facilities requirement. No text change.
M.A.704 (b)	DGAC, France	162	"(b) The continuing airworthiness management exposition and its amendments procedure shall be approved by the competent authority.."	Implementation problem Not all amendments need to be approved. Paperwork should be reduced to the essential in order to facilitate the work of the industry and better allocate authority's resources.	M.B.706 authorises indirect approvals through a accepted procedure. No text change.
M.A.705	CAA UK	123	<u>Suitable</u> is enough.		Previous JAR-OPS M 1.895(h) text. No text change.
M.A.706	Aerospace Industries	170	Insert new subsections after (b) and (d): <u>(b) For authorized maintenance organizations under Part 145, the paragraph (a) accountable manager shall be either the person as defined in Part 145 or another person within the Part 145 organization who meets the requirements of paragraph (a) above.</u> <u>(d) For authorized maintenance organizations under Part 145, the accountable manager shall designate a nominated post holder. This person shall be responsible for the management and supervision of continuing airworthiness activities, pursuant to paragraph (c).</u> <i>Comment: As explained in the comment to M.A. 702 above in order to provide clarification where Part 145 organizations act as approved continuing airworthiness management organization.</i>		This is not permitted within the Part-M concept and ICAO Annex 6. Only the Operator can have a nominated postholder for continuing airworthiness issues. No text change.
M.A.706	T. M. Gonzalez, Pratt & Whitney	084	Insert new subsections after (b) and (d): <u>(b) For authorized maintenance organizations under Part 145, the paragraph (a) accountable manager shall be either the person as defined in Part 145 or another person within the Part 145 organization who meets the requirements of paragraph (a) above.</u> <u>(d) For authorized maintenance organizations under Part 145, the accountable manager shall designate a nominated post holder. This person shall be responsible for the management and supervision of continuing airworthiness activities, pursuant to paragraph (c).</u> <i>Comment: As explained in the comment to M.A. 702 above in order to provide clarification where Part 145 organizations act as approved continuing airworthiness management</i>		This is not permitted within the Part-M concept and ICAO Annex 6. Only the Operator can have a nominated postholder for continuing airworthiness issues. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			organization.		
M.A.706 (a)	LBA	57	The requirements for the accountable manager should be in correlation with 145.A.30(a).		Text now harmonised with Part-145.
M.A.706 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	The organisation shall nominate an accountable manager, acceptable to the competent authority, who has corporate authority for ensuring that all continuing airworthiness management activities can be financed and carried out in accordance with this part.	As it was required by the ECAR-M Graft 3.3 (1.706) and the JAR-OPS 1 Subpart C (1.175, h), it'll be preferable to keep the right to the Authority to accept the accountable manager. Indeed, the Authority should have the possibility to make sure that this person has a perfect knowledge of his future responsibility.	This is not the current JAA policy on accountable managers. Furthermore, this is unnecessary as the accountable manager is the cornerstone in the organisation which means that if he is not acceptable the approval cannot be granted. No text change.
M.A.706 (a)	H.T. Beekelaar, Martinair	008	An Accountable Manager Continuing Airworthiness is mentioned, is this the same Accountable Manager for JAR-OPS?		In the case of commercial air transport, yes. See M.A.706(b)
M.A.706 (b)	LBA	57	AMC material needed to cover cases where one company holds more than one approval requiring an accountable manager. (e.g. Part M Subpart G plus Part 145).		Covered by the AMC. No text change.
M.A.706 (b)	H.T. Beekelaar, Martinair	008	An Accountable Manager Continuing Airworthiness is mentioned, is this the same Accountable Manager for JAR-OPS?		Covered by M.A.706(b)
M.A.706 (b)	DGAC, France	162	(b) For commercial air transport the paragraph (a) accountable manager shall be the person who also has corporate authority for ensuring that all the operations of the operator can be financed and carried out to the standard required for the issue of the Air Operator Certificate by this Part.	<u>Editorial</u> : This makes more clear that the accountable manager designated under this Part to manage the continuing airworthiness management system of the operator must be the accountable manager globally responsible for the complete AOC.	Text changed
M.A.706 (c)	LBA	57	The nominated persons shall be accepted by the competent authority. For subparagraph (d) it is in correlation with JAR-OPS-1.175 i (2)		Covered by Section B. No text change.
M.A.706 (d)	ENAC, Italy	102	The formal acceptance of the post holder by the competent authority should be included. Otherwise there will a significant variation in respect with current JAR OPS requirements and inconsistency with PART 145 approach (see 145A30).		Covered by Section B. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.706 (d)	LBA	57	change "post holder" to: "post holder maintenance" because this wording is used in JAR-OPS 1/3 for this position.		This is not deemed necessary as Part-M deals with continuing airworthiness including maintenance, and no other subject. No text change.
M.A.706 (d)	H.T. Beekelaar, Martinair	008	A Nominated Postholder is required and may not be a member from the ECAR 145 organization, however the authorities can deviate from this. But what procedures are used when JAR-OPS and ECAR 145 is tight together in one organization		Covered by M.A.706(e) and AMC. No text change.
M.A.706 (e)	ENAC, Italy	102	<i>(e) The nominated post holder referred to in paragraph (d) shall not be employed by a Part 145 approved organisation under contract to the operator, unless specifically agreed approved (or accepted) by the competent authority. The term "agreed" is not currently used in JAR-OPS. Better use accepted (informal agreement) or approved (formal agreement).</i>		Agreed is found more appropriate as no formal approval or acceptance is required other than the approval of the CAME.
M.A.706 (e)	H.T. Beekelaar, Martinair	008	A Nominated Postholder is required and may not be a member from the ECAR 145 organization, however the authorities can deviate from this. But what procedures are used when JAR-OPS and ECAR 145 is tight together in one organization		Covered by the AMC. No text change.
M.A.706 (f)	Martin Ambrose, ERA	079	Can the agency provide a definition for the term "appropriate staff"		Text changed.
M.A.706 (f)	Manfred Bialonczyk, BMVIT	081	Delete the word "normal" in M.A.706 (f).	Delete the word "normal" in M.A.706 (f).	Text changed.
M.A.706 (g)	Loganair Glasgow	96	Clarification required on ' appropriate experience'		Developed in AMC. No text change.
M.A.706 (g)	LBA	57	"All paragraph (c) and (d) persons..." because post holder maintenance should fulfil the requirements listed in this subparagraph.		Text changed.
M.A.706 (g)	LBA	57	M.A.706 Personnel requirements (g) Add „and (d)“ after –All paragraph (c) persons to “All paragraph (c) and (d) persons..... Remark: A mention is missing, to whom such personnel should demonstrate relevant knowledge.		Text changed.
M.A.706 (g)	P. Doyer, AEI	034	Sentence to be continued after a comma, "such persons to be acceptable to the competent Authority".		Covered by Section B. No text change.
M.A.706 (g)	Mike Newman, ALAE	009	Sentence to be continued after a comma, "such persons to be acceptable to the competent authority".		Covered by Section B. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.706 (h)	Martin Ambrose, ERA	079	This paragraph requires the organisation to "demonstrate" the qualification of all personnel involved in continuing airworthiness management. How does the Agency expect this to be demonstrated?		Text changed
M.A.706 (h)	Warner van der Veer-Jehee, KLM Fleet Services	017	Is this only valid for the subpart G1 approved organization staff as mentioned in the CAME, or does this include everybody working under the Quality system of the subpart G approved organization? (such as Engineering staff contracted for maintenance program development).		This is inclusive. No text change.
M.A.706 (i)	LBA	57	Add the following new subparagraph: (i) Airworthiness review staff nominated by the approved continuing airworthiness organisation shall fulfil the requirements of M.A.707.		706 deals with personnel requirements and 707 is specifically organisation related. No text change.
M.A.707	Virgin Atlantic Airways	153	Para 2 of ECAR-M1.707 states "hold an appropriate ECAR 66 licence". Which category ? Does this have to be type rated for the aircraft on which the Airworthiness Review is being performed ? Are "grandfather rights" Member State licenses valid for the purposes of this paragraph ? Para 3 of AMC ECAR-M1.707 states "airworthiness review staff should have a position in the organisation independent from their airworthiness management process" . Who should they report to, the Accountable Manager or the Independent Quality System Manager ? This paragraph requires clarification.		The type of license is clarified in the AMC. No grandfather right provision is needed as it is already covered by the "equivalent" qualification level. The position is specified in the AMC. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707	DGAC, France	162	<p>OPTION A — Modify M.A.707 as follows “(a) To be approved to carry out airworthiness reviews, an approved continuing airworthiness management organisation shall have appropriate airworthiness review staff to issue M.A. Subpart I airworthiness review certificates or recommendations. In addition to M.A.706(h) requirements, this staff shall have acquired:</p> <ol style="list-style-type: none"> 1. at least five years experience in continuing airworthiness, and; 2. an appropriate Part 66 licence or an aeronautical degree or equivalent, and; 3. formal aeronautical maintenance training, and; 4. a position within the approved organisation with appropriate responsibilities. <p>(b) Airworthiness review staff nominated by the approved continuing airworthiness organisation can only be issued an authorisation by the approved continuing airworthiness organisation when formally accepted approved by the competent authority after satisfactory completion of an airworthiness review under supervision.</p> <p>(c) The organisation shall ensure that aircraft airworthiness review</p>	<p>OPTION A <i>Option proposed in the draft</i> Implementation problems: - The best way to get confidence in airworthiness review staff is to survey directly an airworthiness review with the candidate. - There is no reason to refer to the Part 66 licence in paragraph (d) and (e) as this is just a proof of minimum qualifications (as could be an aeronautical degree). In addition this could lead to misunderstanding by inducing airworthiness review staff to use their licence number as a reference when signing an airworthiness review certificate which is not part of the privileges associated to such a licence.</p> <p>OPTION B — <i>DGAC preferred option</i> - See option A - See comment to M.A.710 - Leave flexibility to the State of Registry to do it himself or delegate it to the industry.</p> <p>See comments n°7 on article 7 of the Regulation, N°29 on M.A.710 Airworthiness review and n°33 on M.A.902 – Aircraft airworthiness review</p>	<p>Option B is not compatible with uniform application of the rule throughout the EU. It does not give legal certainty to the applicant. Option A: Text changed in accordance with option A.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707			<p>Subpart I airworthiness review certificates or recommendations. In addition to M.A.706(h) requirements, this Airworthiness review staff shall have acquired:</p> <ol style="list-style-type: none"> 1. at least five years experience in continuing airworthiness, and; 2. an appropriate Part 66 licence or an aeronautical degree or equivalent, and; 3. formal aeronautical maintenance training, and; 4. a position within the approved organisation with appropriate responsibilities. <p>b) Airworthiness review staff nominated by the approved continuing airworthiness organisation can only be issued an authorisation by the approved continuing airworthiness organisation when formally accepted shall be approved by the competent authority after satisfactory completion of an airworthiness review under supervision..</p> <p>(c) The organisation shall ensure that aircraft airworthiness review staff can't shall be possible to demonstrate appropriate recent continuing airworthiness management experience of the airworthiness review staff.</p> <p>(d) Airworthiness review staff shall be ide</p>		<p>Option B is not compatible with uniform application of the rule throughout the EU. It does not give legal certainty to the applicant. Option A: Text changed in accordance with option A.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707	Jim Gibbons, KLM Engineering	130	<p>To be approved to carry out airworthiness reviews, an approved continuing airworthiness management organisation shall have appropriate airworthiness review staff to issue M.A. Subpart I airworthiness review certificates or recommendations. In addition to M.A 706(h) requirements this staff shall have acquired:</p> <ul style="list-style-type: none"> at least 5 years experience in continuing airworthiness, and; an Part-66 Cat B or Cat C licence, or a current NAA issued licence valid in at least two categories or an aeronautical degree or equivalent, and; formal aeronautical maintenance training, and; a position within the approved organisation with appropriate responsibilities <p>In cases of non compliance with any of the provisions of 1) to 4). The applicant shall satisfy the NAA that the nominated persons provide an equivalent level of confidence</p> <p>Some organisations would have to make significant structural changes or move responsibilities to accommodate the requirements. This could also lead to unnecessary Industrial Relation issues within the compa</p>		The 66 license is just one qualification option. The category is set in the AMC. No text change.
M.A.707	Warner van der Veer-Jehee, KLM Fleet Services	017	Is it possible for a commercial operator to contract a subpart G approved company to perform the airworthiness review? KLM's view is that this should be possible.		This is possible, but the ARC would not be extendable to 3 years. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707	Tyrolean Airways	100	Personnel who presently exercise airworthiness reviews and issue airworthiness review certificates under national regulation should be given „grandfather rights“ in this para. (a2) Which Category Licence A, B, or C? Why a Part 66 licence at all when staff should be „airworthiness management“ experienced. Part 66 is only „maintenance experience“ related! An aeronautical degree can not substitute the maintenance experience gained in Part 66 (a3) Definition of „formal aeronautical training“ missing (Basic-, Engineering-, Type-, Accident Investigation training?)		The category is set in the AMC. From our knowledge no grandfather rights are needed as these personnel already satisfy this requirement. No text change.
M.A.707	British Airways CitiExpress Limited	155	Will staff holding restricted B1 or B2 AML issued under protected rights be acceptable as review staff?		Developed in AMC. No text change.
M.A.707	H.T. Beekelaar, Martinair	008	1. Experience requirements are more extensive than for an Inspector C of A renewal 2. ECAR 66 license. What are the procedures for keeping his license current		1. Experience requirements are recommended by ICAO. 2. Part-66 details currency requirements. No text change.
M.A.707	Eoin Anderson, CHC Scotia Ltd	002	In reviewing the above-mentioned document, we were surprised to find amongst the required qualifications for Airworthiness Review Staff at Paragraph MA.707, that a Part 66 licence or an aeronautical degree or equivalent is required as a pre-requisite, whereas previous MST discussions identified the requirement for the Part 66 licence under the Airworthiness Review as contractable-in, and not as a mandatory qualification for the Airworthiness Review Staff. Has EASA/JAA now altered its position from previous MST discussions? However, when referring to para. MA 710(b), it clearly states for this survey, airworthiness review staff maybe assisted by Part 66 qualified personnel. This would seem to be within the spirit of the MST recommendations, and is a more realistic approach from an industry perspective. We require urgent confirmation regarding the qualification for Airworthiness Review Personnel and MA.710(b), in that skills can be contracted in to any organisation, when required. Please be advised we have only		Part-66 is not mandatory as a minimum requirement for airworthiness review staff. No change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707 (a)	Martin Ambrose, ERA	079	It is our opinion that this entire paragraph is too prescriptive. Many organisations that have been carrying out the recommendations for the renewal of Certificates of Airworthiness for many years would have difficulty in meeting the requirements defined in this paragraph. Furthermore, in some EU Member States such as Portugal, an Aeronautical Degree has not been available until very recently. Finally, which category of Part 66 licence is required under this paragraph?		An equivalent of an aeronautical degree is possible and these are the requirements recommended by ICAO. No text change.
M.A.707 (a)	Manfred Bialonczyk, BMVIT	081	In M.A.707 (a), reference should be made to " M.A.706 "	Reference to M.A.706(h) is misleading.	Text changed.
M.A.707 (a)	Martin Ambrose, ERA	079	This paragraph requires a "full" documented review of the aircraft records. Can the Agency provide a definition of the word "full"?		Not applicable to this paragraph. No text change.
M.A.707 (a)	Fédération Française de vol en voile	026	5 years for a light piston engine aircraft is long. We propose 2 years.		This is an ICAO recommended practice. No text change.
M.A.707 (a)	CAA UK	123	It is felt that it is unnecessary to define qualifications for airworthiness review staff. It should be left to the approved organisation to authorise sufficiently qualified staff.		Minimum standards need to be set. No text change.
M.A.707 (a)	Mr Cartry	173	5 years for a light piston engine aircraft is long. We propose 2 years.		This is an ICAO recommended practice. No change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707 (a)	Danish Soaring Association	180	2.Specifies that certifying staff must have a "Part 66 license or aeronautical degree or equivalent", For glider maintenance, this is a severe problem, because Sailplane Technicians (or other equivalent national ratings) do not normally have Part 66 certificated/licences. This rule should contain a statement that "until such time as ECAR-66 specifies a requirement for certifying staff of aircraft, other that aeroplanes and helicopters, the relevant Member State regulation applies". (it is noted that ECAR-66 draft 4.3 Subpart B "Aircraft other than aeroplanes and helicopters" contains as its only statement: "Until such times as ECAR-66 specifies a requirement for certifying staff of aircraft other than aeroplanes and helicopters, the relevant Member State regulation applies". However, because this ECAR-66 statement does not seem not have a direct implication on the privilege of issuing a "Airworthiness Review Certificate" or a recommendation for the airworthiness review" i.a.w. IR-M, there is a need		Part-66 is not mandatory as a minimum requirement for airworthiness review staff. No text change.
M.A.707 (a)	Fédération Francaise de vol en voile	039	5 years for a light piston engined aircraft is long. We propose 2 years.		This is an ICAO recommended practice. No text change.
M.A.707 (a) (1)	Finnair Oyj Technical Services	072	A paragraph M.A.707 (a)(2) is too restrictive. Also other technical personnel should be allowed to act as Airworthiness review staff if accepted by Continued Airworthiness Management Organisation.		The word equivalent gives latitude and is expanded in the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707 (a) (1)	Europe Air Sports	73		<p>It must be recognised that for the light aircraft industry, there are very few Part 66 licensed engineers. Generally, these engineers are licensed under national requirements (BCAR Section L in the UK) for light aircraft, or are approved by NGB organisations in the case of gliders.</p> <p>For gliders, please refer to comments above under M.A.606 – the same issue arises in the context of airworthiness review staff.</p> <p>(a)1: specifies that certifying staff must have “at least five years experience in continuing airworthiness”. This requirement was not in previously reviewed drafts of ECAR-M, and does not seem to have been introduced due to any review comments. It would introduce severe problems into glider maintenance organisations (e.g. recruitment and utilisation/availability of personnel), and should be removed.</p> <p>It is therefore unacceptable to require a Part 66 licensed engineer to carry out the airworthiness review.</p>	<p>Part-66 license is not mandatory for airworthiness review staff.</p> <p>No text change.</p>
M.A.707 (a) (2)	Loganair Glasgow	96	definition of 'equivalent qualification' required.		<p>AMC expands the subject.</p> <p>No text change.</p>
M.A.707 (a) (2)	LBA	57	The words “appropriate” and “equivalent” should be explained in the AMC. The minimum requirement should be a technical degree. We suggest the wording “equivalent technical degree”. What is an appropriate Part 66 licence? (Cat B, Cat C?)		<p>AMC expands the subject.</p> <p>No text change.</p>
M.A.707 (a) (2)	Manfred Bialonczyk, BMVIT	081	In M.A.707 (a)(2) the text should read: “... an appropriate Part 66 qualification or...”	The appropriate qualification according Part 66 is not always a license! (e.g. balloons, gliders)	<p>Part-66 is not mandatory as a minimum requirement for airworthiness review staff.</p> <p>No text change.</p>
M.A.707 (a) (2)	Martinair Holland	089	Although the concept of Airworthiness Reviews is welcomed, it is questionable whether this should be performed by staff having only a Part 66 licence or an aeronautical degree. As Part 66 only addresses certifying staff in a maintenance environment and airworthiness review inspectors normally work for a Continuing Airworthiness management organisation there is no merit in this requirement unless its intention is that someone who used to hold a Part 66 licence (or predecessor), but is no longer current, is considered as “equivalent”. If that is meant, it should be clearly written here.		<p>Part-66 is not mandatory as a minimum requirement for airworthiness review staff.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.707 (b)	LBA	57	A paragraph in Section B or an AMC is needed for standardisation of the form and the requirements. Is this staff allowed to certify maintenance in Part M Subpart F organisation / Part 145 organisation and also work in a Part M Subpart G organisation to do an airworthiness review? Is it allowed to employ the same persons in two organisations?		This is not prohibited by the rule. No text change.
M.A.707 (c)	Loganair Glasgow	96	Clarify 'management experience' is required.		Covered by AMC
M.A.707 (d) (e)	IVW, The Netherlands	99	Editorial: CAA-NL suggests to delete the words "aircraft maintenance" in reference to the Part 66 aircraft maintenance license as used everywhere else in the text		Text changed.
M.A.707 (e)	T. M. Gonzalez, Pratt & Whitney	084	Revise the first sentence as follows: (e) The organisation shall maintain a record of all airworthiness review staff, which shall include details of any Part 66 aircraft maintenance licence, or equivalent qualification, held together with a summary of relevant continuing airworthiness management experience and training and a copy of the authorisation. <i>Comment: Equivalent qualification is provided for within M.A. 707.</i>		Text changed.
M.A.707 (e)	Aerospace Industries	170	the first sentence as follows: (e) The organisation shall maintain a record of all airworthiness review staff, which shall include details of any Part 66 aircraft maintenance licence, or equivalent qualification, held together with a summary of relevant continuing airworthiness management experience and training and a copy of the authorisation. <i>Comment: Equivalent qualification is provided for within M.A. 707.</i>		Text changed.
M.A.708	DGAC, France	162	Add a new paragraph (d): “(d) A Commercial air transport operator shall retain effective control on subcontracted continuing airworthiness management tasks. It may only subcontract such tasks to an approved continuing airworthiness management organisation.”	<u>Basic principles</u> To avoid dilution of responsibilities by series of subcontracts, the person at the end doing the work without any proper control.	Proposed text contradicts M.A.711(a), then conclusions of the JAA TGL 34 group and would dilute operators responsibilities as defined in ICAO Annex 6. Furthermore, subcontractors are audited by the competent authority as defined by the AMC to M.B.704(c). No text change.
M.A.708 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	Modify the text as follows: All continuing airworthiness management shall be carried out according to the prescriptions of M.A. Subpart C and the continuing airworthiness management exposition at all times.	In our view, the statement in M.A.604, (a), 1, is not sufficient to put a legally binding obligation on the organisation to use the manual. Subpart G comes from JAR-OPS which says: JAR-OPS 1.175, 1) The operator must ensure that every flight is conducted in accordance with the provisions of the Operations Manual.	There is enough legal basis. The CAME is signed by the accountable manager, therefore it is legally binding. The example given addresses the OPS manual is not dealt with in Part-M, but in JAR-OPS. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.708 (b)	Ralph Schütte, Lufthansa Germany	150	1. Ensure the development and control of a maintenance program....	Argument: present wording does not reflect the possibility to subcontract tasks according to M.A. 711 (a) 3.	Subcontracting is permitted and further clarified in the AMC. When subcontracting, the work is being carried out under the operator's approval. The operator is therefore developing the maintenance program as its contentment is entirely its responsibility. No text change.
M.A.708 (b)	Lufthansa AG Germany	021	1. <u>Ensure the</u> development and control of a maintenance program....	Argument: present wording does not reflect the possibility to subcontract tasks according to M.A. 711 (a) 3.	Subcontracting is permitted and further clarified in the AMC. When subcontracting, the work is being carried out under the operator's approval. The operator is therefore developing the maintenance program as its contentment is entirely its responsibility. No text change.
M.A.708 (b)	Ralph Schütte, Lufthansa Germany	025	1. Ensure the development and control of a maintenance program....	present wording does not reflect the possibility to subcontract tasks according to M.A. 711 (a) 3.	Subcontracting is permitted and further clarified in the AMC. When subcontracting, the work is being carried out under the operator's approval. The operator is therefore developing the maintenance program as its contentment is entirely its responsibility. No text change.
M.A.708 (b)	CAA UK	123	Replace 'For every aircraft' with 'For every aircraft managed'. The original wording is considered misleading.		Text changed.
M.A.708 (b) (1)	Michael Loges, Rolls-Royce, Germany	062	To be added: For small, non-commercial used aircraft the maintenance program / instructions from the aircraft; engine and propeller TC-holder should be used as maintenance program.		The owner/ Subpart G organisation may develop its own maintenance program/instructions, as specified in Subpart C. If a TC-Holder wishes its recommendations to become mandatory, it must do so through the channels provided by Part-21. No text change.
M.A.708 (b) (3)	LBA	57	add behind repairs: "in accordance with Part 21". (see M.A.304)		The management of the function is not defined in Part-21. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.708 (b) (5)	ENAC, Italy	102	1. Operational directives ensure that all applicable airworthiness directives and operational directives are applied, Operational directives are operational requirements which, by nature, affect the intended operation of the aircraft rather than its airworthiness. Therefore they cannot be comprised in the continuing Airworthiness of the aeroplane. It is responsibility of the owner or Flight Operations Department of the Operator that an aircraft dispatched for a certain flight complies with the operational directives applicable to that flight. Compliance with operational directives should therefore be specifically required with a separate work order, procedure or whatever else arrangement by the owner /operator.		Text changed, but not as required.
M.A.708 (b) (7)	CAA UK	123	Replace 'brought' with 'taken'		Text changed.
M.A.708 (c)	Loganair Glasgow	96	At what level of scheduled line maintenance does the requirement to have a maintenance agreement as opposed to a Annex B agreement apply?		Original JAR-OPS 1.895(d) text. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.708 (c)	ENAC, Italy	102	<p><i>(c) In the case of commercial air transport, when the operator is not appropriately approved to Part 145, the operator shall establish a written maintenance contract between the operator and ultimately a Part 145 appropriately approved maintenance organisation detailing the functions specified under M.A.301- 2, M.A.301-3, M.A.301-5, M.A.301-6 and M.A.301-7 and defining the support of the quality functions of M.A.712(b). The aircraft base, scheduled line maintenance and engine maintenance contracts, together with all amendments, shall be approved by the competent authority. However, in the case of:</i></p> <p><i>(1) an aircraft requiring occasional line maintenance, the contract may be in the form of individual work orders addressed to the Part 145 maintenance organisation.</i></p> <p><i>(2) component maintenance, including engine maintenance, the contract as referred to in paragraph (c) may be in the form of individual work orders addressed to the Part 145 maintenance organisation.</i></p> <p><i>(d) Notwithstanding paragraph (c) above, the operator m</i></p>		Text changed, but not as required. Subject is further developed in the AMC.
M.A.708 (c)	IVW, The Netherlands	99	<p>CAA-NL suggests to amend the direct reverence to M.A.301.7 and replace this with the following: "the execution of non-mandatory information in accordance with the policy specified in M.A.301.7", since the operator must formulate the policy and the maintenance organisation only performs the modification on the aircraft or component.</p>		Reference to M.A.301.7 is deleted.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.708 (c)	Manfred Bialonczyk, BMVIT	081	The term "defining the support of the quality functions of M.A.712(b)" should be explained.	The term "defining the support of the quality functions of M.A.712(b)" is unclear.	Will be clarified in the AMC.
M.A.708 (c)	Manfred Bialonczyk, BMVIT	081	In M.A.708(c) the reference to M.A.301-7 should be deleted.	The responsibility of the modification embodiment policy (M.A.301-7) should rest with the operator and not with the maintenance organisation.	Reference to M.A.301.7 is deleted.
M.A.708 (c)	AEA Brussels	020	JAR OPS requires that contracts and amendments must be acceptable to the authority, ECAR M requires an approval.		The term "acceptable" is not legally binding and therefore must be avoided. Section B defines the possibility for indirect approvals. No text change.
M.A.708 (c)	Hugo Spruyt Belgian Civil Aviation Authority	016	In the case of commercial air transport, when the operator is not approved to Part 145, the operator shall establish a written maintenance contract between the operator and ultimately a Part 145 approved maintenance organisation detailing the functions specified under M.A.301-2, M.A.301-3, M.A.301-5, M.A.301-6 and M.A.301-7 and defining the support of the quality functions of M.A.712(b). The technical aspects of the aircraft base, scheduled line maintenance and engine maintenance contracts, together with all amendments, shall be accepted by the competent authority.	It's preferable to use the word "accepted" in place of "approved" because the competent authority is not responsible for the commercial part of the contract. The only responsibility of the competent authority is to determine if the contract covers the requirements of the PART-M. Moreover, in comparison with the Leaflet 15 of the JAR-OPS Subpart M, the requirements of this proposal of regulation is less developed than the requirements of the actual Leaflet 15.	The term "acceptable" is not legally binding and therefore must be avoided. Section B defines the possibility for indirect approvals. No text change.
M.A.708 (c)	Aerospace Industries	170	Revise the first sentence as follows: (c) In the case of commercial air transport, when the operator is not approved to Part 145, the operator shall either establish a written maintenance contract between a suitably rated Subpart G organization or the operator and ultimately a Part 145 approved maintenance organisation detailing the functions specified under M.A.301-2, M.A.301-3, M.A.301-5, M.A.301-6 and M.A.301-7 and defining the support of the quality functions of M.A.712(b). ... <i>Comment: This change clarifies that Subpart G organizations may contract directly with commercial operators. If this is not the intent, then clarification is needed as M.A 711 would also need clarification.</i>		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.708 (c)	T. M. Gonzalez, Pratt & Whitney	084	Revise the first sentence as follows: (c) In the case of commercial air transport, when the operator is not approved to Part 145, the operator shall either establish a written maintenance contract between a suitably rated Subpart G organization or the operator and ultimately a Part 145 approved maintenance organisation detailing the functions specified under M.A.301-2, M.A.301-3, M.A.301-5, M.A.301-6 and M.A.301-7 and defining the support of the quality functions of M.A.712(b). ... Comment: This change clarifies that Subpart G organizations may contract directly with commercial operators. If this is not the intent, then clarification is needed as M.A 711 would also need clarification.		Text changed.
M.A.708 (c) (1)	LFV, Sweden	105	The text – “an aircraft requiring occasional line maintenance,.....” A definition of “occasional line maintenance” is required. It has been a very controversial issue in many countries and at MAST visits.		"Occasional" is opposed to "scheduled". No text change.
M.A.708 (c) (1)	LBA	57	A skeleton contract, which shall be accepted by the competent authority shall be required for engine maintenance and occasional line maintenance. The detailed work will be specified on work order basis.		Will be clarified in the AMC.
M.A.708 (d)	Warner van der Veer-Jehee, KLM Fleet Services	017	JAR ops requires that contracts and amendments must be acceptable to the authority, ECAR M requires an approval.		The term "acceptable" is not legally binding and therefore must be avoided. Section B defines the possibility for undirect approvals. No text change.
M.A.708(b) 9	CAA UK	123	Add 'Ensure that the current mass & balance reflects the current status of the aircraft' to the numbered list under Part M A.708 (b)		Text changed.
M.A.708(b) 9	CAA UK	123	Change to read "9. manage & archive all maintenance records as defined in M A.305(b) together with the operator's technical log"		"Maintenance records" changed to "continuing airworthiness records".
M.A.710	AEA Brussels	020	Airworthiness review : The physical survey of large aircraft is a great and undue additional burden (once every three years) in relation to current JAR OPS M and is considered not necessary in a controlled aircraft environment.		The product audits are already a requirement under JAR-OPS. Part-M only specifies their content, gives them a minimum frequency and a value towards the validity of the certificate of airworthiness that they did not have in the past. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710	Jim Gibbons, KLM Engineering	130	The aircraft survey requirements of a complete configuration check against approved documentation. Will this require every seat position to be checked for a life jacket? every seat belt need to be checked for security and operation? Better definition required. This proposal might be satisfactory for general aviation but is not practical for an operator of large commercial aircraft. A sample check process should be agreed taking into account the operators AMP requirements Clarification required.		Defined in the AMC.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710	DGAC, France	162	<p>OPTION A — Amend existing M.A.710 as follows : In paragraph (a), change reference to “M.A.708” by “M.A.902” Add at the end of paragraph (e): “An airworthiness review certificate or a recommendation shall not be issued if the aircraft is not airworthy. In such case, the organisation shall inform the State of Registry and enter the information in the logbook.” Add a new paragraph: “The approved continuing airworthiness management organisation shall, upon request, inform its competent authority of any planned airworthiness review. The owner of an aircraft shall upon request inform the State of Registry of any planned airworthiness review .” Add a new paragraph: “Airworthiness review tasks shall not be sub-contracted” Add a new paragraph “The organisation shall ensure independence between the airworthiness review process and the continuing airworthiness management process.” OPTION B — Amend M.A.710 as follows and transfer it to Subpart I or to an airworthiness review appendix “(a) To satisfy the requirement for</p>	<p>OPTION A — <i>Option proposed in the draft</i> <u>Editorial</u> <u>Implementation problem:</u> It is essential for the State of Registry, which is responsible for the airworthiness of the aircraft, to be informed of any deficiency found on an aircraft which renders it unairworthy in addition mention on the logbook would limit the risk of the aircraft still being flown without rectification or being brought to an other organisation and hiding the problem. <u>Implementation problem:</u> This will facilitate oversight by the competent authorities. This will also be an additional opportunity for the authority to complete the survey programme required by M.B.303 <u>Implementation problem:</u> Confidence for the transfer of these tasks from the authority to the industry can only be gained and oversight can only be achieved efficiently if airworthiness review is directly carried out by the approved organisation and not subcontracted. <u>Implementation problem:</u> It is essential to ensure proper independence of continuing airworthiness management and airw</p>	<p>Option B is not compatible with uniform application of the rule throughout the EU. It does not give legal certainty to the applicant. Option A: (1) Reference to M.A.902 included. (2) The intent of the proposal is covered by M.A.202 on occurrence reporting. No text change. (3) Intent of proposed text covered by M.A.902(e) and M.A.715(b). (4) Text changed. (5) The intent of the proposal is covered by the independent quality audit function. No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710			<p>7. all service life limited components installed on the aircraft are properly identified, registered and have not exceeded their approved service life limit, and;</p> <p>8. all maintenance has been released in accordance with this Part, and;</p> <p>9. the current mass and balance statement reflects the configuration of the aircraft and is valid, and;</p> <p>10. the aircraft complies with the latest revision of its type design approved by the Agency.</p> <p>(b) The approved continuing airworthiness management organisation's airworthiness review staff, shall carry out a physical survey of the aircraft. For this survey, airworthiness review staff not appropriately qualified to Part 66 shall be assisted by such qualified personnel.</p> <p>(c) Through the physical survey of the aircraft, the airworthiness review staff shall ensure that:</p> <p>1. all required markings and placards are properly installed, and;</p> <p>2. the aircraft complies with its approved flight manual, and;</p> <p>3. the aircraft configuration complies with the approved documentation, and;</p> <p>4. no</p>		
M.A.710	Michel Ducamp FNAM France	171	Delete improper reference to M.A.708		Text changed
M.A.710	Warner van der Veer-Jehee, KLM Fleet Services	017	The physical survey of large aircraft is a great and undue additional burden (once every three years) in relation with current JAR-OPS-M and is considered not necessary in a controlled aircraft environment.		This is currently part of C of A renewal procedures in most countries. No text change.
M.A.710	H.T. Beekelaar, Martinair	008	This item is creating some confusion: A G1 organization must be supported by adequate ECAR 66 trained personnel, what is part of the ECAR 145 organization. The G1 is no part of the ECAR 145, so how can the supporting staff remain current?		Currency of maintenance experience does not apply to Subpart G airworthiness review staff. No text change.
M.A.710	DCA Malta	003	item: Part M, section A, subpart G, M.A. 710 Airworthiness Review comment: "this subpart does not appear to address the issue of any remedial actions resulting from the airworthiness review"		The ARC or recommendation cannot be issued unless remedial actions have been taken. No change needed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710	Eoin Anderson, CHC Scotia Ltd	002	In reviewing the above-mentioned document, we were surprised to find amongst the required qualifications for Airworthiness Review Staff at Paragraph MA.707, that a Part 66 licence or an aeronautical degree or equivalent is required as a pre-requisite, whereas previous MST discussions identified the requirement for the Part 66 licence under the Airworthiness Review as contractable-in, and not as a mandatory qualification for the Airworthiness Review Staff. Has EASA/JAA now altered its position from previous MST discussions? However, when referring to para. MA 710(b), it clearly states for this survey, airworthiness review staff may be assisted by Part 66 qualified personnel. This would seem to be within the spirit of the MST recommendations, and is a more realistic approach from an industry perspective. We require urgent confirmation regarding the qualification for Airworthiness Review Personnel and MA.710(b), in that skills can be contracted in to any organisation, when required. Please be advised we have only		Part-66 is not mandatory as a minimum requirement for airworthiness review staff. No text change.
M.A.710 (a)	IVW, The Netherlands	99	Editorial: CAA-NL thinks it is clearer to say that the airworthiness review is carried out by the “airworthiness review staff of the approved continuing airworthiness management organisation”		The Subpart G approval is granted to the organisation. No text change.
M.A.710 (a)	CAA UK	123	Remove reference to M A.708 as the reference is not required		Text changed.
M.A.710 (a) (10)	Michael Loges, Rolls-Royce, Germany	062	Latest type design approved should better read latest issue of the related type certificate data sheet issued by the agency.		"Type design" has a wider scope than the data sheet. No text change.
M.A.710 (a) (2)	Europe Air Sports	73		Many vintage aircraft do not have flight manuals therefore it would be impossible to carry out an airworthiness review of the type called for on this class of aircraft.	Aircraft specified in Annex II in Regulation (EC) 1592/2002 include many vintage aircraft. Such aircraft are therefore exempt from the requirement. Other vintage or orphan aircraft can be dealt with in two ways: -> If the competent authority finds that these aircraft cannot be conform to Part-21 they can be issued with Permits to fly and such aircraft, according to Article 3.3 to the draft regulation are exempt from Part-M. -> Otherwise the aircraft will remain in the general environment and the provisions of Part-M for light aircraft will apply. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (a) (6)	Michael Loges, Rolls-Royce, Germany	062	To be added: For foreign type certified products the approval from the foreign type certifying authority should be deemed equivalent.		Reference is made to Part-21, which is the certification requirement. No text change.
M.A.710 (a) (7)	Loganair Glasgow	96	Requirement to have all life limited components properly identified. This cannot be a physical check, is identification on a control system sufficient?		Already addressed in the text ("fully documented review"). No text change.
M.A.710 (a) (7)	Europe Air Sports	73		See note above under M.A.503 Service Life Limited Components.	See above response to M.A.503. No text change.
M.A.710 (a) (8)	Michael Loges, Rolls-Royce, Germany	062	It is the responsibility of the maintenance organization to assure that all maintenance is released i.saw. the relevant requirements.		On the contrary it is the responsibility of the owner/operator. No text change.
M.A.710 (a) (9)	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> · Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; · Operational directive (M.A. 301, item 5); · Mass and balance report (M.A. 305(d); 710(a) 9); · Aircraft to comply with approved AFM (M.A. 710(c)) <p>(It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft)</p> <ul style="list-style-type: none"> · Requirements with phrases such as "no flight takes place unless" (M.A. 201(a)) "the aircraft must not fly " (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airwor 		These requirements are either existing are existing JAR OPS/M requirements or covered by the ICAO requirements for continuing airworthiness. No text change.
M.A.710 (b)	Ralph Schütte, Lufthansa Germany	150	For aircraft being not in a controlled environment according M.A. 902 (b) the approved continuing airworthiness review staff, shall carry out a physical survey of the aircraft...	Argument: Aircraft in a controlled environment are continuously under surveillance. The listed physical check items are part of a normal maintenance program and will be checked periodically. (No value added)	This is not necessarily true. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (b)	Ralph Schütte, Lufthansa Germany	150	Any kind of a physical survey is maintenance per se! This is valid even if it is only the opening/closing of access panels. So it is felt unlogical to oblige the Subpart G organisation to perform a physical inspection. This can only be delegated to a maintenance organisation.		Any kind of physical survey is not necessarily maintenance. Finally the AMC on the issue provides for the necessity to issue a CRS after certain surveys. No text change.
M.A.710 (b)	Europe Air Sports	73		The requirement for a Part 66 licensed engineer to conduct the airworthiness review is overly burdensome for the light aircraft industry (see comment on M.A.707 Airworthiness Review Staff).	Qualification to Part-66 does not mean holding a Part-66 license for gliders. According to Part-66, for aircraft other than airplanes and helicopters national requirement apply. No text change.
M.A.710 (b)	Loganair Glasgow	96	Qualification requirement does not reflect those detailed in M.A.707 (a)		This is a complement to allow of adequately qualified certifying staff to be present during the aircraft survey. No text change.
M.A.710 (b)	LBA	57	Is a physical review needed in any case? Or are some exemption given? Or are some exemption given? Is there a check flight needed? More explanation in AMC material is needed.		No exemptions are given. AMC developed on the issue. No text change.
M.A.710 (b)	Martin Ambrose, ERA	079	This paragraph requires the assistance of an appropriately qualified Part 66 Engineer to assist in the physical survey of the aircraft. How does the Agency plan to cater for countries that have chosen not to adopt JAR-66 and, as such, will not have any grandfather rights approved engineers? Portugal is, again. One such country. This requirement for Part 66 approved engineers appears in numerous other paragraphs and needs to be addressed accordingly.		The implementation status of JAR 66 is not the issue. Part-66 caters for transition and conversion of national licenses/qualifications. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (b)	Alain Picard, AECMA	045	<p>The proposed regulation introduces an airworthiness review which includes in addition to the usual AD and maintenance records review, a physical check of the airplane. The anticipated interval for this review being one year, or up to three years if the maintenance is done in one controlled organization. This disposition is totally irrelevant on our business airplanes, considered as commercial air transport, if they are operated under JAR OPS1.</p> <p>a) The operators do not have like the airlines one maintenance organization which performs all the maintenance tasks. Due to the nature of our operations, maintenance is performed in different places by different organizations depending upon aircraft geographical location, Service center availability, or pricing. It means that in most cases, the yearly review will be required.</p> <p>b) Unlike the airlines / transport aircraft, our business fleet operates an average of 300 to 500 hours per year. Therefore, our approved maintenance program is of the low utilization type</p>		<p>One may have various maintenance organisations under contract while keeping one continuing airworthiness management organisation, which allows for three-year review. The key point for the controlled environment is the stability with one Subpart G organisation.</p> <p>No text change.</p>
M.A.710 (b)	Ralph Schütte, Lufthansa Germany	025	<p>For aircraft being not in a controlled environment according M.A. 902 (b) the approved continuing airworthiness review staff, shall carry out a physical survey of the aircraft...</p>	<p>Aircraft in a controlled environment are continuously under surveillance. The listed physical check items are part of a normal maintenance program and will be checked periodically. (No value added)</p>	<p>This is not necessarily true.</p> <p>No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (b)	Lufthansa AG Germany	021	<u>For aircraft being not in a controlled environment according M.A. 902 (b)</u> the approved continuing airworthiness management organisations airworthiness review staff, shall carry out a physical survey of the aircraft...	<u>Argument:</u> Aircraft in a controlled environment are continuously under surveillance. The listed physical check items are part of a normal maintenance program and will be checked periodically.	This is not necessarily true. No text change.
M.A.710 (b)	Lufthansa AG Germany	021	Any kind of a physical survey is maintenance per se! This is valid even if it is only the opening/closing of access panels. So it is felt unlogical to oblige the Subpart G organisation to perform a physical inspection. This can only be delegated to a maintenance organisation.		Any kind of physical survey is not necessarily maintenance. See also AMC. No text change.
M.A.710 (c)	Ralph Schütte, Lufthansa Germany	150	Any kind of a physical survey is maintenance per se! This is valid even if it is only the opening/closing of access panels. So it is felt unlogical to oblige the Subpart G organisation to perform a physical inspection. This can only be delegated to a main perform a physical inspection. This can only be delegated to a maintenance organisation.		Any kind of physical survey is not necessarily maintenance. See also AMC. No text change.
M.A.710 (c)	Lufthansa AG Germany	021	M.A. 710 (c) refers to the scope of the physical survey in M.A. 710 (b). This scope of the physical survey is – by far - not realistic. Depending upon the question if the M. A. 710 airworthiness review is carried out in accordance with M.A. 902 (aircraft within controlled environment) or in accordance with M.A. 904 (aircraft being imported into the EU) the performance of the physical survey will require different contents and depth. This must be addressed separately for M.A. 902 and M.A. 904 reviews in M.A. 710 (c) or this paragraph must be deleted and AMC material should be published accordingly. <u>Argument:</u> An airworthiness review of an aircraft which is within a controlled environment is continuously under surveillance and will need only a limited or even no physical survey, while on an used aircraft being imported into the EU, a thorough physical review will be required and special attention should be paid to all modifications and repairs carried out on the aircraft.		Scope of the physical survey is defined by the organisation in accordance with the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (c)	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> . Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; . Operational directive (M.A. 301, item 5); . Mass and balance report (M.A. 305(d); 710(a) 9); . Aircraft to comply with approved AFM (M.A. 710(c)) <p>(It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft)</p> <ul style="list-style-type: none"> . Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airwor 		<p>These requirements are either existing are existing JAR OPS/M requirements or covered by the ICAO requirements for continuing airworthiness.</p> <p>No text change.</p>
M.A.710 (c) (2)	Michael Loges, Rolls-Royce, Germany	062	2. Should read: The approved flight manual complies to the aircraft.		<p>The intent is not to amend the flight manual.</p> <p>No text change.</p>
M.A.710 (d)	LBA	57	The regulation needs to prevent the accumulation of extended review intervals. The ninety days should be reduced to thirty days. Considering good planning methods and fact that the airworthiness review certificate is issued on a monthly basis this time (actually sixty days) should be sufficient.		<p>The three month anticipation provision is considered to give the necessary flexibility.</p> <p>No text change.</p>
M.A.710 (e)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.710 (e) to: “...review certificate (Appendix 3 - EASA Form XXa) or a recommendation is ...”	Reference to Appendix 3 - EASA Form XXa is missing.	Text changed in the Appendix.
M.A.710 (e)	Manfred Bialonczyk, BMVIT	081	M.A.710 (e) the text should read:	An airworthiness review certificate should not be issued when defects were found during the airworthiness review, which have an effect to the airworthiness of the aircraft.	Text changed.
M.A.710 (e)	CAA UK	123	Add (form XXa) after airworthiness review certificate and the words ‘and no defects were found’ at the end of the sentence.		<p>(1) Form reference added.</p> <p>(2) Deferred defects may exist. No change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.710 (f)	LBA	57	Add: "in a period not longer than ten days." The State of registration should keep its register on an up-to-date basis.		Text changed.
M.A.710 (f)	Michael Loges, Rolls-Royce, Germany	062	To be added: and to the member state of operation, if different		C of A is the state of registry's responsibility. No text change.
M.A.711	Europe Air Sports	73		The distinction between the tasks listed under (a) (i.e. "Manage the continuing airworthiness of aircraft") and the tasks under (b) (i.e. "issue an airworthiness review certificate" or "make a recommendation for the airworthiness review") seems unclear. In practice, isn't an "airworthiness review certificate" or "recommendation for airworthiness" the end result (with respect to documentation) of the task "manage the continuing airworthiness"?	Text shows these two activities are not the same and do not have the same purpose. No text change.
M.A.711	CAA UK	123	For better understanding, this should be at the beginning of the document		This is similar to other rules such as Part-145. No text change.
M.A.711	DGAC, France	162	<p>" (a) Subject to compliance with paragraph (d), an approved continuing airworthiness management organisation, may</p> <p>1. manage the continuing airworthiness of non commercial air transport aircraft as listed on the approval certificate.</p> <p>2. manage the continuing airworthiness of aircraft when listed on its air operator certificate.</p> <p>3. arrange to carry out any task of continuing airworthiness within the limitation of its approval with another organisation that is working under its quality system.</p> <p>(b) An approved continuing airworthiness management organisation, may additionally be approved to:</p> <p>1. issue an airworthiness review certificate, or;</p> <p>2. make a recommendation for the airworthiness review to a Member State of Registry.</p> <p>(c) An organisation shall be registered in one of the Member States to be granted the privilege pursuant to paragraph (b).</p> <p>(d) the organisation may exercise the privileges of paragraph (a) and (b) provided it remains in compliance with this Part, particularly the provisions related to the hand</p>	<p><u>Implementation problem:</u></p> <p>M.A.711 should not only gives the privileges of an approved organisation, but also the conditions under which such privileges may be used.</p> <p>See also comment to M.A.715</p>	This intent of the proposal is already covered by M.A.715. No text change.
M.A.711 (a)	Michael Loges, Rolls-Royce, Germany	062	Instead of "air transport aircraft" it should read "large aircraft" because large aircraft are clearly defined.		"Commercial air transport aircraft" misunderstood. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.711 (a) (3)	LBA	57	AMC material is needed to specify under which conditions sub-contracting is allowable.		Covered by Appendix 2 to the AMC and AMC M.A.201(h).
M.A.712	Europe Air Sports	73		The wording in sub-paragraph (f): "In the case of a small M.A. Subpart G organisation that does not have the privileges granted under M.A.711 (b)," seems contradictory. If a subpart G organisation (= Continuing Airworthiness Management Organisation) does not have the privilege to issue an airworthiness review certificate or make a recommendation for airworthiness, such an organisation appears to be of little use, as an airworthiness review certificate is required for the airworthiness certificate to be valid.	There is no contradiction between the two options provided. No text change.
M.A.712	IVW, The Netherlands	99	CAA-NL suggests to explicitly include a timeframe of two years in which all relevant aspects of the approved organisation are to be monitored, in stead of the implicit timeframe of 2 years now given in paragraph (c), this to avoid discussions on frequencies and intensity of the monitoring system.		Monitoring periodicity explicitly defined in the AMC. No text change.
M.A.712 (a)	LBA	57	AMC material is needed for the wording "on a regular basis" to get a common standard. AMC material is needed to define the organisational review.		Monitoring periodicity explicitly defined in the AMC. No text change.
M.A.712 (b)	CAA UK	123	We recommend deleting all but the first sentence as this could be AMC material		Transposition of existing JAR-OPS text. No text change.
M.A.712 (b) (1)	Martin Ambrose, ERA	079	This paragraph contains a spelling error. "preformed" should be replaced with "performed".		Text changed.
M.A.712 (f)	Michael Loges, Rolls-Royce, Germany	062	712 (f) gives unacceptable advantage to small organizations and shall be deleted. Small organizations shall have a simplified Quality System.		No advantage is given as the scope of work is limited. No text change.
M.A.712 (f)	P. Doyer, AEI	034	This particular sub paragraph needs enlarging. It suggests what can be done, but does not say how it will be done. We need more sub paragraphs to inform the reader what an Organizational Review is expected to cover. Will it be an internal Review? Is an external auditor required? If an auditor is required will that person have to be recognized by a competent Authority? You need to be more specific, or draw the reader's attention to a document that covers such reviews, applicable to a small organization.		Covered by the AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.712 (f)	Mike Newman, ALAE	009	This particular sub paragraph needs enlarging. It suggests what can be done, but does not say how it will be done. We need more sub paragraphs to inform the reader what an Organisational Review is expected to cover. Will it be an internal review? Is an external auditor required? If an auditor is required will that person have to be recognized by a competent authority? You need to be more specific, or draw the reader's attention to a document that covers such reviews, applicable to a small organisation.		Covered by the AMC. No text change.
M.A.713	CAA UK	123	Add 'airworthiness review staff (if applicable)' to the list as they need to be accepted by competent authority		Covered by "staff affecting the approval" and M.A.707(b). No text change.
M.A.713	LBA	57	A regulation is needed, that the competent authority should make a statement, which requirements have to be fulfilled by the continuing airworthiness management organisation during the transition time. The paragraph 145.A.85 should also be amended.		This is a competent authority privilege. Covered by M.B.706. No text change.
M.A.713	P. Doyer, AEI	034	Addition required to this sentence. After "Airworthiness Management Organization" add "or the nominated person who carries out organizational reviews as stated in M.A.712(f)". The rest of the sentence continues as written.		The approval is granted to the organisation, which has to notify changes. No text change.
M.A.713	Mike Newman, ALAE	009	Changes to the Approved Continuing Airworthiness Organisation Addition required to this sentence. After "Airworthiness Management Organisation" add "or the nominated person who carries out organisational reviews as stated in M.A.712 (f)". The rest of the sentence continues as written.		The approval is granted to the organisation, which has to notify changes. No text change.
M.A.713 (5)	Manfred Bialonczyk, BMVIT	081	M.A.713 (5) delete "senior"	"Senior" not specified or defined in M.A. 706(c)	Text changed.
M.A.714	H.T. Beekelaar, Martinair	008	The record keeping of all ARC's even 2 years after phase out of the aircraft is a little bit too much, since the last ARC describes all findings and restorations.		2 years corresponds to the audit cycle. No change.
M.A.714 (a)	CAA UK	123	Remove '..to the competent.' and replace with '..the competent authority.'		Text changed.
M.A.714 (a)	IVW, The Netherlands	99	Records must be "acceptable" to the authority, CAA-NL does not see the need to prescribe a uniform format to the industry and suggests to change the wording.		No uniform format is required. No text change.
M.A.714 (a)	LFV, Sweden	105	The text – "all details of work carried out in a form specified by to the competent." Should probably read – " all details of work carried out in a form specified by the competent authority.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.714 (a)	Martin Ambrose, ERA	079	This paragraph contains errors. The first part of the second line should be amended to read "carried out in a form specified by the competent authority".		Text changed.
M.A.714 (a)	Manfred Bialonczyk, BMVIT	081	M.A.714 (a) the text should read: "... a form specified by to the competent authority."	Editorial	Text changed.
M.A.714 (a)	P. Doyer, AEI	034	Typographical error:-Second line down should read "carried out in a form specified by the competent Authority". Delete "to" add "Authority".		Text changed.
M.A.714 (a)	Mike Newman, ALAE	009	Typographical error:- Second line down should read "carried out in a form specified by the competent Authority". Delete "to" add "Authority".		Text changed.
M.A.714 (b)	Martinair Holland	089	This paragraph requires the continuing airworthiness management organisation (GA-organisation) to retain a copy of each airworthiness review certificate and recommendation issued, together with all supporting documents. The CofA proves that the aircraft was airworthy at the start of the operation within the EU, the last ARC proves that the aircraft is airworthy when the last CofA-inspection was performed. Since the CofA (not being revoked) and last ARC prove the continuing airworthiness of the aircraft. This means it has no added value to retain all airworthiness review certificates, since all the records on which the review is based are already retained by the operator. Also the through registration of the aircraft on an AOC there is proof that aircraft is and was in a controlled environment (as mentioned in M.A.902). We recommend to remove to the retaining of all airworthiness review certificates.		The approved organisation must keep records in order to demonstrate compliance with the approval basis, use the result of prior reviews to facilitate present ones and rebuild history. No text change.
M.A.714 (c)	CAA UK	123	To correct an error, change 'listed in paragraph (a) and (b)' to 'listed in paragraph (b)'		Text changed.
M.A.714 (c)	LBA	57	If the aircraft is withdrawn form service, how does the CAMO get the information, when during in service time of the A/C more than one CAMO was involved? To solve this problem the following subparagraph shall be added: "The copies of documents should be transferred to the new contracted Part M Subpart G organisation."		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.714 (c)	Martinair Holland	089	Requires the continuing airworthiness management organisation (GA-organisation) to retain the copy of all records listed in (a) and (b) until 2 years after the aircraft has been withdrawn form service. Retaining documents is not the responsibility of the GA-organisation, its an operators responsibility to retain records. Their is no added value to retaining record 2 years after withdrawal form service, this causes a unnecessary copying of 2 years of records at the hand over of an aircraft to a new holder (next operator). The regulations should make it possible to gain access to the records handed over to the new operator / owner if necessary. We recommend to keep the responsibility for retaining records at operator as was required per JAR-OPS 1 Subpart M and replace the 2 year retaining after withdrawal of service by a regulation on accessing records which are handed over to the next operator. We also recommend to require that airworthiness review staff must have access to the records.		The approved organisation must keep records in order to demonstrate compliance with the approval basis, use the result of prior reviews to facilitate present ones and rebuild history. No text change.
M.A.714 (c)	Manfred Bialonczyk, BMVIT	081	M.A.714 (c) the text should read: "... all records listed in paragraph (b) as specified in M.A.305(h)."	This paragraph should be consistent with M.A.305(h).	Text changed.
M.A.714 (d)	AEA Brussels	020	Record keeping. Next to damage and theft, JAR OPS also uses the word "alterations" to indicate that records may not be tampered with.		Text changed.
M.A.714 (d)	Warner van der Veer-Jehee, KLM Fleet Services	017	To prevent tampering with records, JAR-OPS also uses the word alterations		Text changed.
M.A.715	CAA UK	123	To correct an error, change 'd), e), f)' to read ' a), b), c)'		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.715	DGAC, France	162	Amend the text as proposed, and transfer (a) and (b) in section B as conditions for suspension An approval shall be issued for an unlimited duration. It shall remain valid subject to: (a) the organisation remaining in compliance with this Part, particularly the provisions related to the handling of findings as specified under M.B.705 and; (b) the competent authority being granted access to the organisation to determine continued compliance with this Part, and; (c) the certificate not being until surrendered, superseded, revoked, suspended or expired.	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 any non compliance with the regulation the complete approval becomes invalid. What's more if it happens that the non compliance existed 10 days before the audit, it mean that retroactively the approval was invalid since 10 days ! A privilege associated to the approval (see comment to M.A.711) would only mean that the organisation is not authorised to accomplish the tasks affected by the non compliance but can accomplish any other task - Paragraph (b) is more appropriate as a condition to suspend the approval. 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 ap	Additional conditions as specified are authority actions and are already covered in M.B.705.
M.A.715	ENAC, Italy	102	A provision shall be added to deal with changes other that exposition amendments, in a way similar to 145.B35.		Covered by M.A.713. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.715	ENAC, Italy	102	In M.A. 715 "continued validity of approval" should in some way allow for time limited approvals. This to give to the competent authority more flexibility (for instance due to national constraints or in critical situations that are not appropriately addressed with suspensions).		No possibility for time limited approvals. (CRD to regulation). No text change.
M.A.715	Manfred Bialonczyk, BMVIT	081	Change paragraphs d), e) and f) to a), b) and c) .	Editorial	Text changed.
M.A.715	H.T. Beekelaar, Martinair	008	G1 approval is in sequence with AOC. How is this covered with a ECAR 145 organization which is also a G1 certified organization		Combined expositions addressed in AMC M.A.704.
M.A.715 (c)	Manfred Bialonczyk, BMVIT	081	Change the text in M.A.715 (c) to: "the approval certificate not being surrendered."	Wording not in line with M.B.703 (a) and Appendix 6.	Consistent with Part-145. No text change.
M.A.715 (d)	P. Doyer, AEI	034	To assist the reader I suggest it be written as follows: - "The organisation remaining in compliance with this Part, particularly the provisions related to the handling of findings revealed by quality audits as specified under M.B.705".		Proposed text already covered by (a). No text change.
M.A.715 (d)	Mike Newman, ALAE	009	To assist the reader I suggest it be written as follows:- "The organisation remaining in compliance with this part, particularly the provisions related to the handling of findings revealed by quality audits as specified under M.B.705".		Proposed text already covered by (a). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.801	DGAC, France	162	<p>I – Amend paragraph (a) “(a) Except for aircraft released to service maintained by a Part-145 organisation, the certificate of release to service shall be issued according to this subpart ”</p> <p>II - Introduce in M.A.801 the elements from M.A.607(b) as amended: “In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff is available, the maintenance organisation contracted to provide maintenance supportperson responsible for the continuing airworthiness management of the aircraft, in accordance with M.A.201, may issue, after advice from an approved maintenance organisation, a one off certification authorisation: (i) to one of its employees holding type qualifications on aircraft of similar technology, construction and systems; or (ii) to any person with not less than 5 years maintenance experience and holding a valid ICAO aircraft maintenance licence rated for the aircraft type requiring certification provided there is no organisati</p>	<p>I – <u>Editorial</u>: what is covered here is the release II – <u>Implementation problem</u>: - See comment to M.A.607(b) - The person responsible for continuing airworthiness management shall decide of who is maintaining the aircraft. However, it should seek advice from an approved maintenance organisation on the competence of the foreign mechanics.</p>	<p>I - Text changed. II - This is only possible within the Subpart F environment when released by appropriate certifying staff. This is not a Subpart G issue. No text change.</p>
M.A.801	H.T. Beekelaar, Martinair	008	What are the possibilities for the Flight Engineer when he properly trained?		This is a Part-145 exemption only. No text change.
M.A.801	Michael Loges, Rolls-Royce, Germany	062	The Certificate of Release to Service should be governed only by One Part, either Part M or Part 145 and cover both applications. Preferably Part 145 should reference for CRS Part M Subpart H, which than has to include the application for Part 145. a release i.a.w. Part M is not mentioned on the EASA Form One.		Some Part-M and Part-145 texts are kept separate in order to facilitate discussions on bilateral agreements. No text change.
M.A.801 (3) (c)	P. Doyer, AEI	034	By the M.A.803 Pilot Owner, suggest that first line be changed as follows:- delete "staff", insert "pilot-owner". Sentence would read:- in the case of a Release to Service under (b)2 the certifying pilot/owner may etc etc.		This paragraph does not apply to the pilot/owner. No text change.
M.A.801 (3) (c)	Mike Newman, ALAE	009	Suggest that first line be changed as follows:- delete "staff", insert "pilot-owner". Sentence would read: In the case of a Release to Service under (b)2 the certifying pilot/owner may etc etc.		This paragraph does not apply to the pilot/owner. No change.
M.A.801 (a)	Martin Ambrose, ERA	079	This paragraph excludes aircraft maintained by a Part-145 organisation. Can the Agency advise where such aircraft are catered for within Part M?		Text changed.
M.A.801 (a)	Martinair Holland	089	M.A. 801(a) excludes JAR-145 maintained aircraft from Subpart H. Why then is this subparagraph not raised to a higher level, e.g.		Text changed, but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			M.A. 800, and named "Applicability"?		
M.A.801 (b)	CAA UK	123	For clarity, split paragraph (b) at the start of the second sentence to create a new paragraph (c)		No justification. No text change.
M.A.801 (b) (2)	Loganair Glasgow	96	Does this allow individual certification rather than under a JAR145 Approval? No appendix 7 listed tasks.		Dealt with in paragraph (a). No text change.
M.A.801 (d) (2)	Manfred Bialonczyk, BMVIT	081	Change paragraph to sub-paragraph .	Editorial	Text changed.
M.A.801 (e)	Manfred Bialonczyk, BMVIT	081	Change sub-paragraph to paragraph .	Editorial	Text changed.
M.A.802 (b)	Michael Loges, Rolls-Royce, Germany	062	Does the EASA Form One generally constitute the release to service of a component, independent, whether it has been maintained by a Part M or a Part 145 organization and may common components be used visa-versa?		EASA Form 1 identifies the regulation under which the release has been issued. No text change.
M.A.803	CAA UK	123	We recommend that a clearer definition of 'aircraft' be provided for all Parts including Part M		Defined in the draft Regulation. No text change.
M.A.803	Hugo Spruyt Belgian Civil Aviation Authority	016	The competence of the pilot-owner should be assessed by somebody; for example, by the subpart-G tasked to make the recommendation to renew the ARC, by the subpart-F organisation doing heavy maintenance or by the Authority prior to approval of the maintenance programme (assessment of difficulty of tasks in annex 8 in relation with the particular aircraft).		The number and complexity of tasks being limited, there is no need for a competence assessment by the authority. No text change.
M.A.803 (a)	LFV, Sweden	105	ASA suggest that there should be an upper limit for the number of co-owners of the aircraft eligible for pilot-owner authorisation. A reasonable number could be 5.		No justification. No text change.
M.A.803 (a)	Esa Ailio CAA Finland	157	M.A 803 (a) The pilot-owner is the person who owns or , or jointly owns or is a member of registered flying club that owns the aircraft being maintained and holds a valid pilot licence with the appropriate type or class rating. It has been a long time practice in Finland, that a flying club has been considered equivalent to private ownership or joint ownership.		Will be clarified in the AMC. No text change.
M.A.803 (b)	Dutch Helicopter Association	106	"For any privately operated piston or turbine engine aircraft with a maximum of...etc." The DHA sees no difference in limited maintenance as described in ECAR-M Appendix 8 on piston or turbine engine light aircraft/helicopters, therefore the DHA		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			suggests to add "or turbine" to Article M.A.803 b).		
M.A.803 (b)	LFV, Sweden	105	The text – “, the pilot-owner may issue the certificate of release to service after limited pilot owner maintenance listed in Appendix 8” Appendix 8 seems to contain some rather complex tasks that a pilot-owner may perform. It would be necessary with guidance material that stipulates how the pilot-owner should be trained in order to carry out such tasks.		Appendix 8 requires compliance with M.A.402, which itself requires competence. No text change.
M.A.803 (b)	Eoin Anderson, CHC Scotia Ltd	002	Could you please also confirm that pilot owner maintenance is not permitted on any helicopters as stated in Part M, sub part HPOara M.A.803(b).		A helicopter is an aircraft. Pilot-owner maintenance applies to all aircraft. No text change.
M.A.803 (b)	Europe Air Sports	73		We note that the person carrying out pilot maintenance must complete a CRS, whereas with the UK system a CRS is not required after pilot maintenance. We do not consider it appropriate or necessary for a pilot to issue a CRS in these circumstances. Instead, we suggest that the pilot records the work carried out in the logbook if in accordance with allowable 'Pilot Maintenance', and signs the logbook with his pilot license number or equivalent.	The pilot-owner is requested to complete a CRS. This means signing for the work carried out. This can be done in the logbook. There is no change from the existing system. The pilot owner must take responsibility for the work carried out. No text change.
M.A.803 (d)	Michael Loges, Rolls-Royce, Germany	062	It is not clear, which licence number a pilot owner shall use, is it his pilot's licence number? A pilot owner has no certifying staff licence number.		Text changed.
M.A.901	ENAC, Italy	102	M.A.901 (b) and M.A. 901(c), should be deleted because Part M deals with the continuous airworthiness certificate.		"Continuous" airworthiness certificate does not mean it cannot be invalidated. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.901	ENAC, Italy	102	<p>M.A. 901 Airworthiness Review Certificate</p> <p>To ensure the validity of the Certificate of Airworthiness, a valid Airworthiness Review Certificate must be attached to it;</p> <p>An airworthiness review certificate is issued in accordance with appendix 3 after a satisfactory airworthiness review and is valid one year.</p> <p>An aircraft in a controlled environment is an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations. This includes M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 and .A.801(b)3.</p> <p>If an aircraft is within a controlled environment, the continuing airworthiness management organisation managing the aircraft may if appropriately approved:</p> <p>1 - issue the airworthiness review certificate in accordance with M.A.710, and;</p> <p>2 - for airworthiness review certificates it has issued, when the aircraft has</p>		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.901			<p>2. the continuing airworthiness of the aircraft or any component fitted to the aircraft does not meet the requirements of this Part;</p> <p>3. The aircraft has been operated beyond limitations of the approved flight manual or of the Certificate of Airworthiness until appropriate action to restore the airworthiness is taken;</p> <p>4. The aircraft has been involved in an accident or incident that affects the airworthiness of the aircraft until appropriate action to restore the airworthiness is taken</p> <p>The description of the conditions of validity of a Certificate of Airworthiness are considered to be superfluous, since they are contained in Part 21. Therefore they should be changed with the condition about the validity of the Airworthiness Review Certificate, which falls in the regulatory domain of Part M. The concept that an aircraft cannot fly without a valid CoA is contained in the Aeronautic</p>		Text changed.
M.A.901	CAA UK	123	Recommend changing 'Airworthiness Certificate' to 'Certificate of Airworthiness' as this is the ICAO term. This terminology should be used throughout <u>ALL</u> EASA Parts		In line with Part-21. No text change.
M.A.901	ENAC, Italy	102	Subpart I CONTINUING VALIDITY OF AN AIRWORTHINESS CERTIFICATE- AIRWORTHINESS REVIEW CERTIFICATE . <u>The change of the title is primarily needed for consistency with Section B Subpart I Airworthiness review certificate. The condition for the validity of an Certificate of Airworthiness are set forth in Part 21, and there's no sense to duplicate them inside the Part M. Among the conditions listed in Part 21, is clearly listed that to the C of A must be attached a valid Airworthiness Review Certificate (ARC), which is instead entirely managed inside the Part M. Therefore no other information, nor requirement, on the validity of C of A is needed in Subpart I. See also specific comment on merging MA 901 and MA 902. Therefore Subpart I should not contain any condition of validity for the CoA, but rather focus on the validity of the ARC .</u>		Text changed.
M.A.901 (b)	CAA UK	123	Letter 'n' missing from 'An airworthiness certificate'		Text changed.
M.A.901 (b) (1)	CAA UK	123	For clarity, add '.by the State of Registry' to the end of this clause.		This is implicit. No text change.

Part-M Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.901 (b) (2)	CAA UK	123	Suggest that M A.901 (b) 2 be amended to read ‘..airworthiness review certificate is kept with the Certificate of Airworthiness on the aircraft’		Text changed, but not as proposed.
M.A.901 (b) (3)	CAA UK	123	Suggest change to ‘..the aircraft is no longer registered		Text changed.
M.A.901 (c)	Martinair Holland	089	<p>Taking continuing airworthiness as the scope of this document, it appears that in some cases it regulates items outside that scope whereas other items inside that scope are missing.</p> <p>Outside scope:</p> <ul style="list-style-type: none"> · Pre-flight inspection, as far as items are checked falling outside the scope of continuing airworthiness such as servicing items, presence of operational equipment, doors closed, wing contamination, etc. (M.A. 301, item 2) ; · Operational directive (M.A. 301, item 5); · Mass and balance report (M.A. 305(d); 710(a) 9); · Aircraft to comply with approved AFM (M.A. 710(c)) <p>(It would be more logical to check during an airworthiness review whether the AFM is conform the aircraft)</p> <ul style="list-style-type: none"> · Requirements with phrases such as “no flight takes place unless” (M.A. 201(a)) “the aircraft must not fly “ (M.A. 901(c)) as they are addressed to pilots and operators, not to persons or organisations responsible for continuing airwor 		<p>These requirements are either existing are existing JAR OPS/M requirements or covered by the ICAO requirements for continuing airworthiness.</p> <p>No text change.</p>
M.A.901 (c) (5)	Michael Loges, Rolls-Royce, Germany	062	To be added: For products of foreign type design the approval of the foreign type certifying authority shall be deemed equivalent.		<p>This is covered by Part-21.</p> <p>No text change.</p>
M.A.902	AOPA	141	when a plane is under a non controlled environment, the ARC should be issued by the Subpart G organisation which has made the recommendation to the Authority, if the Authority agrees with the recommendation, extension of Appendice 8 for some operations.		<p>In the uncontrolled environment the Authority issues the ARC which prevents duplication of work.</p> <p>No text change.</p>
M.A.902	CAA UK	123	For clarity, it is recommended that the content of M A.902 (c) be re-positioned to precede the content of M A.902(b) i.e. re-order paragraphs		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.902	Jim Gibbons, KLM Engineering	130	<p>An Airworthiness Review Certificate is issued in accordance with appendix 3 after a satisfactory airworthiness review and is valid <u>for three years providing the aircraft is maintained within a controlled environment.</u></p> <p>An aircraft in a controlled environment is an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations, This includes M.A .803(b) maintenance carried out and released to service according to M.A.801(b)2 and M.A.801(b)3.</p> <p>If an aircraft is within a controlled environment, the continuing airworthiness management organisation managing the aircraft may if appropriately approved: Issue the airworthiness review certificate in accordance with M.A.710; .</p> <p>For airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, the airworthiness management organisation managing the a</p>		<p>Experience shows that the controlled environment is not always maintained during three years. The extendable ARC caters for this case. No text change.</p>
M.A.902	AOPA	141	<p>(d) If an aircraft is not within a controlled environment, the airworthiness review certificate is issued by the approved continuing airworthiness organisation which has carried out the review in accordance with M.A.710 and which has made a positive recommendation to the competent authority which in return, has accepted that recommendation. The recommendation has to be made by an appropriately approved continuing airworthiness management organisation sent together with the application from the owner or operator.</p>	<p>Cost of maintenance increase as well as delay if a third party, especially like authority is involved into delivering in a the ARC (transfer of data with means not defined, ...).</p> <p>The proposed system where some airworthiness review certificates are signed by the industry and other airworthiness review certificates are signed by the authority seems confusing. One can wonder why, once it has been decided to accept signature of airworthiness reviews by approved organisations, it would not be better to have all ARC signed by approved organisations and none by the authority, which in return has to approve and control organisations.</p>	<p>As there is no approved organisation continuously monitoring the aircraft, the competent authority can only control the product itself. It cannot rely on another organisation to carry out this control. This could lead to difficult situations between the Subpart G organisation and the aircraft owner whereas the competent authority cannot be accused of bias for commercial interests. No text change.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.902	DGAC, France	162	<p>OPTION A</p> <p>“(a) An airworthiness review certificate is issued in accordance with appendix 3 after a satisfactory airworthiness review and is valid one year.</p> <p>(b) An aircraft in a controlled environment is an aircraft used by a commercial air transport operator, or an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations. This includes M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 and M.A.801(b)3.</p> <p>(c) If an aircraft is within a controlled environment, the a continuing airworthiness management organisation managing the aircraft may if appropriately approved:</p> <p>1 - issue the airworthiness review certificate in accordance with M.A.710, and;</p> <p>2 - for airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, extend postpone twice the validity of t</p>	<p>OPTION A —</p> <p><i>Option proposed in the draft</i></p> <p><u>Implementation problem</u></p> <p>- It seems appropriate to consider that a commercial air transport aircraft is in a controlled environment.</p> <p>The text is not appropriate for aircraft short leased from a commercial air transport operator to an other (for example to cope with an aircraft being sent to heavy maintenance). It is not clear whether such aircraft would be considered to be maintained in a controlled environment (with a review every three year) or to taken out the controlled environment (and then have a review after one year)</p> <p>- Paragraph (c) only covers aircraft in a controlled environment where the continuing airworthiness management organisation is appropriately approved for airworthiness reviews, paragraph (d) only covers aircraft outside a controlled environment. The proposed text does not cover the case where an aircraft is within a controlled environment and the continuing airworthiness management organisation is not appropriately approved for airworthiness reviews, paragraph (d) only covers aircraft outside a controlled environment. The proposed text does not cover the case where an aircraft is within a controlled environment and the continuing airworthiness management organisation is not appropriately approved for airworthiness reviews. These aircraft should have some benefit compared to aircraft totally outside a controlled environment and it seems appropriate to give them the same benefit as aircraft covered by paragraph (c). If the airworthiness review might be a little more complex for the organisation, on the other hand it provides complete independence.</p> <p>- The competent authority will only be in a position to make a judgement if the files are provided in a suitable</p>	<p>Option B is not compatible with uniform application of the rule throughout the EU. It does not give legal certainty to the applicant.</p> <p>Option A:</p> <p>(b): An AOC holder is Subpart G approved. No text change.</p> <p>(c): This can only apply to the organisation managing the airworthiness of the aircraft. No text change.</p> <p>(c): It is not the intent for an organisation to take responsibility for another's management work. Text in paragraph (d) changed.</p> <p>(d): Language issues will be dealt with by the Management Board.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.902			<p>(b) An aircraft in a controlled environment is an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations. This includes M.A.803(b) maintenance carried out and released to service according to M.A.801(b)2 and M.A.801(b)3.</p> <p>(c) If an aircraft is within a controlled environment, the continuing airworthiness management organisation managing the aircraft may if appropriately approved:</p> <p>1 - issue the airworthiness review certificate in accordance with M.A.710, and;</p> <p>2 - for airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, the airworthiness review may be extend postponed twice the validity of the airworthiness review certificate for a period of one year. An airworthiness review certificate shall not be extended if the organisation is aware or has reason to believe that the</p>	<p>language.</p> <p>- We propose that the ARC is just considered as a statement that a control (the airworthiness review) has been made at one time. Thus it does not have any validity (only the C of A has one) and it can just mention when the next control is due. See also comment n°46 on Appendix 3.</p> <p>Basic principles</p> <p>The proposed system where some airworthiness review certificates are signed by the industry and other airworthiness review certificates are signed by the authority seems confusing (and it will be difficult to explain to foreign authorities). One can wonder why, once it has been decided to accept signature of airworthiness reviews by approved organisations, it would not be better to have all ARC signed by approved organisations and none by the authority.</p> <p>OPTION B —</p> <p>DGAC preferred option</p> <p>See comments on option A and comments on M.A.710 option B</p> <p>See comments n°7 on article 7 of the Regulation, n°27 on M.A.707 – Airworthiness review staff and n°29 on M.A.710 Airworthiness review</p>	
M.A.902	Michel Ducamp FNAM France	171	“ Aircraft airworthiness review <u>certificate</u> “ Certificate is the subject of this paragraph.		Text changed.
M.A.902	LBA	57	This paragraph should describe which form of Appendix 3 should be used in which case.		The individual Subparts describe which form is required. No text change.
M.A.902 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.902 (a) to: “...review certificate is issued in accordance with Appendix 3 (EASA Form XXa or XXb) after a satisfactory ...”	Reference to EASA Form XXa and XXb is missing.	Text changed.
M.A.902 (a)	CAA UK	123	For clarity, change wording to ‘An airworthiness review certificate (appendix 3) is issued on completion of a satisfactory airworthiness review and is valid for one year’		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.902 (b)	Manfred Bialonczyk, BMVIT	081	Change text in M.A.902 (b) to: "...carried out and released to service according to M.A.801(b)2 and or M.A.801(b)3."	An aircraft can only be released to service according to M.A.801(b)2 or M.A.801(b)3.	Text changed.
M.A.902 (c) (2)	Europe Air Sports	73		The requirement for an airworthiness review certificate having to be issued annually (rather than every three years for Certificates of Airworthiness) unless the aircraft has been operating in a controlled environment seems over-burdensome, costly, and inappropriate to light aircraft operation.	Unfortunately in order to harmonise, the practices of an individual member state cannot always be continued within the EU framework. The option chosen is a compromise that in many cases reduces the burden. No text change.
M.A.902 (c) (2)	Eoin Anderson, CHC Scotia Ltd	002	Please clarify the statement in part m subpart I para M.A.902 (c)2. whereby an approved MA Subpart G organisation is issuing an airworthiness review certificate and the aircraft has been in a controlled environment, this subpart infers that this issuance of an airworthiness review certificate may only be done for 2 annual occasions, what happens after that? Does this mean that all further review must be carried out by the member state NAA?		The validity may be extended twice, however this does not negate the need to have a certificate renewed every three years. No text change.
M.A.902 (d)	LBA	57	AMC material for the recommendation procedure for the Airworthiness Review Certificate is needed. A list of all papers which should be sent to the competent authority should be added.		Detailed in AMC. No text change.
M.A.902 (d)	IVW, The Netherlands	99	Recommendation "to be made in a form and manner established by?". CAA-NL suggests a standard EASA form in the Appendix I.		AMC material details content of the material required however format is not mandated. No text change.
M.A.902 (d)	Fédération Francaise de vol en voile	039	We propose that for <u>light aircraft</u> which is not in a controlled environment the airworthiness review certificate can be issued by the approved continuing airworthiness management organisation.	Decrease of the work charge of the competent authority	As in the case of the non controlled environment there is no approved organisation continuously monitoring the aircraft, the competent authority can only control the product itself. It cannot rely on another organisation to carry out this control. This could lead to difficult situations between the Subpart G organisation and the aircraft owner whereas the competent authority cannot be accused of bias for commercial interests. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.902 (d)	Fédération Française de vol en voile	026	We propose that for <u>light aircraft</u> which is not in a controlled environment the airworthiness review certificate can be issued by the approved continuing airworthiness management organisation.	Decrease of the work charge of the competent authority.	As in the case of the non controlled environment there is no approved organisation continuously monitoring the aircraft, the competent authority can only control the product itself. It cannot rely on another organisation to carry out this control. This could lead to difficult situations between the Subpart G organisation and the aircraft owner whereas the competent authority cannot be accused of bias for commercial interests. No text change.
M.A.902 (d)	Mr Cartry	173	We propose that for <u>light aircraft</u> which is not in a controlled environment the airworthiness review certificate can be issued by the approved continuing airworthiness management organisation.		As in the case of the non controlled environment there is no approved organisation continuously monitoring the aircraft, the competent authority can only control the product itself. It cannot rely on another organisation to carry out this control. This could lead to difficult situations between the Subpart G organisation and the aircraft owner whereas the competent authority cannot be accused of bias for commercial interests. No text change.
M.A.902 (e)	Loganair Glasgow	96	Clarification required on a potential safety threat.		Detailed in Article 10 to Regulation 1592/2002.
M.A.902 (e)	ENAC, Italy	102	Whenever circumstances show the existence of a potential safety threat, the competent authority may decide to carry out, the airworthiness review and issue the airworthiness review certificate itself. In this case, the owner or operator shall provide the competent authority with:... The present text of M.A. 902 "aircraft airworthiness review" point (e) limits to "circumstances show(ing) the existence of a potential safety threat" the possibility for the competent authority to carry out the airworthiness review and issue the A.R.C., creating an unjustified limitation to the Authority that could be brought in court to demonstrate the existence of the safety threat. With the proposed variation such possibility shall be extended to every case in which the competent authority finds appropriate to do so, in order to give to the competent authority enough flexibility to cope with various and even unforeseeable		This proposal would reduce the legal certainty. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<i>situations (for example in case for a specific aircraft type there is no available appropriate approved M.</i>		
M.A.902 (e)	Martin Ambrose, ERA	079	This paragraph contains errors. The comma (,) between the words "out" and "the" on the second line should be deleted.		Text changed.
M.A.902 (e)	Hugo Spruyt Belgian Civil Aviation Authority	016	Different text: 2-When necessary the support of personnel appropriately qualified in accordance with Part-66 and; 3-shall grant complete access to the documentation required by the competent authority.		Text changed but not as proposed.
M.A.903	Loganair Glasgow	96	On the basis of this statement, there will be no additional national requirements (import) to be met as the airworthiness review certificate remains valid.		Yes this is the intent of Article 2 of Regulation (EC) 1592/2002.
M.A.903 (a) (1)	Manfred Bialonczyk, BMVIT	081	M.A.903 (a)(1) the text should read: " - inform the former Member State to which new Member State the aircraft will be transferred, then;"	The wording is unclear.	Text changed but not as proposed.
M.A.903 (a) (1)	CAA UK	123	Change wording to- 'inform the former member state, to which new member state the aircraft will be transferred, then'		Text changed but not as proposed.
M.A.903 (b)	Martin Ambrose, ERA	079	This paragraph states that the former airworthiness review certificate shall remain valid until its expiry date. This being the case, why is there a need to apply for a new certificate as required by paragraph M.A.903 (a) 2?		ICAO Annex 6 links Airworthiness certificate to State of Registry. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.903 (b)	Esa Ailio CAA Finland	157	M.A.903 Transfer of aircraft registration within the EU. (a) When transferring an aircraft registration from one Member State register to another, the applicant shall: 1 - inform the former Member State in which Member State it will be registered, then; 2 - apply to the new Member State for the issuance of a new airworthiness certificate in accordance with Part 21. (b) The former airworthiness review certificate shall remain valid until its expiry date. The applicant shall provide an airworthiness review certificate that is not older than 30 days.	<i>Because the responsibility for surveillance of the continuing airworthiness of the aircraft will be transferred to another member state, the new member state shall have the possibility to ensure and have documentation ensuring that the aircraft is airworthy before the new certificate of airworthiness will be issued.</i>	Part-21 details the specific requirements and furthermore transferring between Member States should not create an additional burden on the applicant. No change.
M.A.904	Warner van der Veer-Jehee, KLM Fleet Services	017	Do new aeroplanes also need een airworthiness review, (they have not completed the full 1 year in a controlled environment) or can an ARC be issued based on the export C of A?		With regard to new aircraft Part-21 applies, within the EU, a Form 52 as required by Part-21 from the manufacturer is required to form the basis of the issue of an ARC and a Certificate of Airworthiness by the Member State. No text change.
M.A.904 (a)	Hugo Spruyt Belgian Civil Aviation Authority	016	2- have an airworthiness review carried out by a properly approved continuing airworthiness management organisation or by the competent authority, and;	It should be more appropriate to keep the possibility of an airworthiness review carried out by the competent authority, as it's planned in M.A.902.	Actions by the competent authority are defined in Part-21. 902 deals with safety threats. No text change.
M.A.904 (a) (2)	Loganair Glasgow	96	What is a 'properly approved maintenance organisation'? Differing terminology MB 303 (g)No listing for Level 3 as currently used.		Text changed. Level of findings is harmonised with Part-145. No text change.
M.A.904 (a) (2)	Michael Loges, Rolls-Royce, Germany	062	For aircraft type design no appropriate approved continuing airworthiness management organization will be available. For this case appropriate provisions are to be included in this part.		Defined in Part-21. No text change.
M.A.904 (a) (3)	IVW, The Netherlands	99	All maintenance has to be carried out by an appropriately approved maintenance organisation or an holder of an appropriate Part 66 licence when the maintenance is not excluded by annex 7. It is unacceptable for the CAA-NL that the CAMO can overrule an approval or licence issued by the competent authority by not agreeing with an AMO. CAA-NL strongly requires to delete the last part of the sentence.		Text changed.
M.A.904 (a) (3)	CAA UK	123	The operator or owner must remain at liberty to choose the appropriately approved maintenance organisation carrying out maintenance on his / her aircraft.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.A.904 (e)	ENAC, Italy	102	(c) The owner shall make arrangements that allow the Member State of Registry to make any investigations, flight tests included, deemed necessary, shall allow access to the aircraft for inspection by the Member State of registry. It is essential for the flight safety that the member State of Registry has the power to do deep assessments including a flight test since some non EU operator could have not reported every aircraft defects or a serious unairworthy condition that could not be assessed on ground.		Covered by Part-21. No text change.
M.A.90X	ENAC, Italy	102	<i>In ENAC opinion the Subpart I should include a paragraph dedicated to the possibility of an unsatisfactory airworthiness review, and the related feed-back from the continuous airworthiness managing organisation.</i> <i>In this manner the competent Authority may decide if further actions are to be taken on the CoA of the aircraft. (see also comment to M.Mb: part MA 90X or 7XX Airworthiness review Feed-back to the Authority</i> (a) When identified during an airworthiness review, the continuous airworthiness managing organisation shall communicate to the competent Authority flight in unairworthy conditions together with the probable causes and the related corrective actions if applicable. (b) Following an unsatisfactory airworthiness review, the continuous airworthiness managing organisation shall report to the competent Authority any unairworthy condition.		Covered by occurrence reporting M.A.202.
M.B.102 (c)	Ralph Schütte, Lufthansa Germany	150	All staff involved in Part-M activities.....to perform their allocated tasks. For those persons performing onsite audits auditortraining according to EN ISO 19011 is required	Argument: Competent authorities need to have competent personnel.	This is deemed to be too specific. No text change.
M.B.102 (c)	Ralph Schütte, Lufthansa Germany	025	All staff involved in Part-M activities.....to perform their allocated tasks. For those persons performing onsite audits auditortraining according to EN ISO 19011 is required.	Competent authorities need to have competent personnel.	This is deemed to be too specific. No text change.
M.B.102 (c)	Lufthansa AG Germany	021	All staff involved in Part-M activities.....to perform their allocated tasks. For those persons performing onsite audits auditortraining according to EN ISO 19011 is required. Argument: Competent authorities need to have competent personnel.		This is deemed to be too specific. No text change.
M.B.102 (c)	CAA UK	123	Replace “..initial & continuation training..” with “appropriately trained..”		No justification. No text change.
M.B.104 (b)	CAA UK	123	With regard to '8) organisation exposition or manual and amendments' in B104(b), it is suggested that only the current approved version and the means by which the document and its amendments were approved should be retained for the period		Organisation Manuals are required to be kept for 4 years in order to reconstruct history should the need arise. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			defined in B 104(c).		
M.B.104 (b) (8)	LBA	57	Change "amendments" to "approval pages of amendments" It is not necessary to keep the different stages of the amendments at the standardized and at the competent authority.		Organisation Manuals are required to be kept for 4 years in order to reconstruct history should the need arise. No text change.
M.B.104 (b) (9)	LBA	57	move 9) to 10) and insert "9) maintenance program (current copy) and approval pages of amendments"		Already covered by (b)(9). No text change.
M.B.104 (c)	T. M. Gonzalez, Pratt & Whitney	084	Revise as follows: (c) The minimum retention period for the paragraph (b) records shall be at least four years. Comment: In keeping with the stated 4-year retention period, there should be some point at which prior issues are no longer to be used against the organization. We recommend that the stated retention period be used for that purpose. Further, to keep consistency between the various competent authorities and assure consistent treatment for authorized organizations, wherever located, the retention period should be constant.		Retention of record period is a minimum Part-M requirement. If there is a limit to information being "used against" organisations it will be set by the national courts but not by this technical requirement. No text change.
M.B.104 (c)	CAA UK	123	Reads; The minimum retention period for the paragraph (b) records shall be at least four years. We currently hold record indefinitely to meet our requirements and are worried that if other Member States only hold for 4 years our requirements cannot be met.		Retention of record period is a minimum Part-M requirement. No text change.
M.B.104 (c)	Aerospace Industries	170	Revise as follows: (c) The minimum retention period for the paragraph (b) records shall be at least four years. <i>Comment: In keeping with the stated 4-year retention period, there should be some point at which prior issues are no longer to be used against the organization. We recommend that the stated retention period be used for that purpose. Further, to keep consistency between the various competent authorities and assure consistent treatment for authorized organizations, wherever located, the retention period should be constant.</i>		Retention of record period is a minimum Part-M requirement. No text change.
M.B.104 (d) (3)	CAA UK	123	There appears to be no guidance on the recommendation format		AMC material details content of the material required however format is not mandated. No text change.
M.B.104 (d) (7)	LBA	57	move 7) to 8) and insert "7) maintenance program (current copy) and approval pages of amendments"		Already covered by (b)(9). No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.104 (e)	Manfred Bialonczyk, BMVIT	081	M.B.104 (e) the text should read: "... until two years after the aircraft has been permanently withdrawn from service, or removed from the Member State register and/or transferred to another register."	If an aircraft has left the register of a Member State this state will have no information if and when that aircraft is permanently withdrawn from service.	State of Registry responsibilities will require that the Member State remains accountable for what occurred to the aircraft whilst on its register for the life of the aircraft. No text change.
M.B.105	T. M. Gonzalez, Pratt & Whitney	084	Edit as follows: (a) In order to contribute to the improvement of air safety, the competent authorities shall participate in a mutual exchange of all necessary information. Comment: Correction of an omission. Edit as follows: (a) In order to contribute to the improvement of air safety, the competent authorities shall participate in a mutual exchange of all necessary information. Comment: Correction of an omission.		Text changed.
M.B.105 (a)	LFV, Sweden	105	The text – “to the improvement of air safety, the competent shall” Should read – “to the improvement of aviation safety, the competent authority shall		Text changed.
M.B.105 (a)	Martin Ambrose, ERA	079	This paragraph contains errors. The word “authority” should be inserted after the word “competent” on the first line.		Text changed.
M.B.105 (a)	Manfred Bialonczyk, BMVIT	081	In M.B.105 (a) the text should read: "... air safety, the competent authority specified in M.1 shall participate ..."	Editorial	Text changed.
M.B.105 (a)	DGAC, France	162	“(a) In order to contribute to the improvement of air safety, the competent authorities shall participate in a mutual exchange of all necessary information.”	Editorial	Text changed.
M.B.105 (a)	CAA UK	123	Should read :- “The competent authority shall participate”		Text changed.
M.B.105 (b)	LFV, Sweden	105	M.B. 105 b) reads: “The information exchanged shall be used solely for the purpose of this Part and its access shall be limited to the participating competent authorities”. We propose the following text: “The information received shall be used solely for the purpose of this Part”. Reason (s) for proposed text: In order to be able to ensure appropriate confidentiality according to national legislation and to achieve consistency with similar statements about exchange of information in the EASA regulation, the directive on occurrence reporting and the directive on the safety of third countries aircraft using community airports.		Article 11 of Regulation (EC) 1592/2002 details that such information should be used during the application of the Regulation. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.105 (c)	Aerospace Industries	170	Edit as follows: (a) In order to contribute to the improvement of air safety, the competent authorities shall participate in a mutual exchange of all necessary information. <i>Comment: Correction of an omission.</i>		Text changed.
M.B.301	ENAC, Italy	102	The reference to M.A. 302(f) seems to be a clerical error since there is no such paragraph;		Text changed.
M.B.301 (a)	Manfred Bialonczyk, BMVIT	081	The text should read: ... authority shall verify that the maintenance programme ...	The competent authority is not in the position to ensure that the maintenance programme is in compliance with M.A.302.	Text changed.
M.B.301 (a)	CAA UK	123	For correctness, change the word 'ensure' to 'verify'		Text changed.
M.B.301 (b)	IVW, The Netherlands	99	Typo: the reference should be M.A.302(e).		Text changed.
M.B.301 (b)	P. Doyer, AEI	034	There is no (f) under M.A.302. Last sub-paragraph is (e).		Text changed.
M.B.301 (b)	Manfred Bialonczyk, BMVIT	081	Change reference in M.B.301 (b) from "M.A.302 (f)" to " M.A.302 (e) ".	Wrong reference.	Text changed.
M.B.301 (b)	Mike Newman, ALAE	009	There is no (f) under M.A.302. Last sub-paragraph is (e).		Text changed.
M.B.301 (b)	CAA UK	123	Should refer to M.A.302 (E) not M.A.302 (F)		Text changed.
M.B.301 (c)	Warner van der Veer-Jehee, KLM Fleet Services	017	The words "controlled environment" should be deleted, otherwise amendments to the maintenance program in the first year, could not be approved through a procedure (which is the current approved procedure with CAA-NL		Text not located. No text change.
M.B.301 (d)	CAA UK	123	Should refer to M.A.302 (c) and (d) not only M.A.302 (d)		Text changed.
M.B.302	CAA UK	123	Should read :- "recorded and retained by the Member States" not "recorded by the Member States".		Text changed.
M.B.302	CAA UK	123	As the reference may change, remove "Article 10, 3."		Not deemed appropriate as this is the Basic Regulation. If it is changed it will have a cascading effect on all implementing rules. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.302	Jim Gibbons, KLM Engineering	130	The operator needs the flexibility to grant exemptions to its Maintenance programme for unforeseen occurrences. Under the ECAR proposal this flexibility has been removed from the operator. Exemption to Mandatory tasks and Airworthiness Directive are still approved by the NAA. Exemptions granted by the operator are not notified to the NAA. (ie up to three months or 500 flying Hrs/cycles) unless a trend is identified.		Exemptions are provided for in Article 10, 3 of the Basic Regulation. No text change.
M.B.302	DGAC, France	162	" All exemptions granted in accordance with Article 10, 3. of the Basic Regulation 1592/2002 shall be recorded by the Member States."	Editorial: Basic regulation is not clear.	Text changed.
M.B.302	IVW, The Netherlands	99	Repetitive and long exemptions shall be notified to the agency and the member states. CAA-NL suggests some standard procedures should be included here		Exemptions are provided for in Article 10, 3 of the Basic Regulation. No text change.
M.B.302	Martin Ambrose, ERA	079	This paragraph makes reference to Article 10,3 of the basic regulation. This article is not contained within the documents included in this consultation process. Can the Agency please provide a copy of Article 10,3?		This document is available on the EU web site. No text change.
M.B.302	Manfred Bialonczyk, BMVIT	081	Change reference in M.B.301 (b) from "Article 10, 3. of the Basic Regulation " to " Article 10, paragraph 3. of the Council Regulation (EC) No 1592/2002 of 15 July 2002 ".	Unclear reference.	Text changed but not entirely as proposed.
M.B.303 (b)	CAA UK	123	For completeness, this should read :- "The survey programme shall include product sample surveys of aircraft"		Text changed.
M.B.303 (g)	Ralph Schütte, Lufthansa Germany	150	Add: 3-Level 3 findings (same definition as in JAR's)	Argument: Level 3 findings and corresponding recommendations proved to be are a helpful tool for the aerospace community to increase air safety. It also helps to adjust the scale of seriousness of findings. This should not be given up. (IR 21 uses as well three levels)	Harmonised with maintenance Parts. No text change.
M.B.303 (g)	Ralph Schütte, Lufthansa Germany	025	Add: 3-Level 3 findings (same definition as in JAR's)	Level 3 findings and corresponding recommendations proved to be are a helpful tool for the aerospace community to increase air safety. It also helps to adjust the scale of seriousness of findings. This should not be given up. (IR 21 uses as well three levels)	Harmonised with maintenance Parts. No text change.
M.B.303 (g)	Lufthansa AG Germany	021	Add: 3-Level 3 findings (same definition as in JAR's)	Argument: Level 3 findings and corresponding recommendations proved to be a helpful tool for the aerospace community to increase air safety. It also helps to adjust the scale of seriousness of findings. This should not be given up.	Harmonised with maintenance Parts. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.304	DGAC, France	162		<u>Implementation problems:</u> The ARC should only be considered as a certificate that an airworthiness review was carried out at a certain date. The document attesting the airworthiness of the aircraft is the Certificate of Airworthiness, thus in case of potential safety threat or if findings are not corrected and the airworthiness of the aircraft is questioned, the C of A should be limited, suspended or revoked and not the ARC (especially when the ARC is issued by the industry). Conditions for limitation, suspension and revocation are already included in Part 21.	The validity of the C of A is limited as detailed in Part-21 - which requires a valid ARC. No text change.
M.B.304 (a)	CAA UK	123	We recommend that "airworthiness review certificate" be deleted and "Certificate of Airworthiness" inserted as there is no process for suspending an ARC.		The validity of the C of A is limited as detailed in Part-21 - which requires a valid ARC. No text change.
M.B.304 (b)	LFV, Sweden	105	Article M.B. 304 b) should read: "suspend, revoke or limit an airworthiness review certificate pursuant to M.B. 303 (g) and (h).		Text changed.
M.B.304 (b)	Martin Ambrose, ERA	079	This paragraph contains errors. The phrase "airworthiness review certificate" should be inserted after the word "an".		Text changed.
M.B.304 (b)	Manfred Bialonczyk, BMVIT	081	In M.B.304 (b) the text should read: " suspend, revoke or limit an airworthiness review certificate pursuant to M.B.303 (g) and (h)."	Editorial	Text changed.
M.B.304 (b)	CAA UK	123	Insert the words 'airworthiness review certificate' before 'pursuant'.		Text changed.
M.B.304 (c)	ENAC, Italy	102	(c) suspend, revoke or limit an airworthiness review certificate if prevented by the person or organisation accountable under M.A 201 to perform the investigations in accordance with M.A308. This addition is needed in coordination with the proposed M.A. 308 Aircraft surveys.		Paragraph M.A.308 regarding flight tests has not been accepted (see previous comment). No text change.
M.B.601	CAA UK	123	The paragraph does not make clear which Member State has the responsibility for the approval.		Responsibility for the approval should be determined in conjunction with paragraph M.1. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.601	DGAC, France	162		<p><u>Impracticable</u></p> <p>There is no justified need to add anything to M.1 stating that the competent authority is, for European organisations, the authority designated by the Member State where that organisation's principle place of business is located, and M.B.201 specifying that the competent authority is responsible for inspections and investigations.</p> <p>This requirement is obscure and raise more questions than it solves :</p> <p>why for investigation and continued oversight reference is made to the Member State and not to the competent authority ?</p> <p>what is an approval carried "in conjunction" with another Member State :</p> <ul style="list-style-type: none"> - is there dual signature of the approval ? Which is unrealistic. - does it mean inspection/oversight of external facilities can only be done by the other Member State, even though only the member State issuing the approval is responsible ? Which is not acceptable. - does it mean that the competent authority of the other State shall provide assistance to the approving authority 	Text changed.
M.B.601	P. Doyer, AEI	034	<p>This needs some amplification. Perhaps an explanation is required. Suggest a rewrite. "Where a major organization has maintenance facilities in other member states the investigation and continued oversight of the approval shall be carried out in conjunction with the findings of the competent Authority of the member state in whose territory the other maintenance facilities are located".</p> <p>The reader would need to be told what will be the condition be on the major organization if a Level 1 finding was found at one of its subsidiary maintenance bases. How would the Level 1 finding be dealt with? Some footnotes to M.B.601 would be of assistance.</p>		Covered in AMC. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.601	Mike Newman, ALAE	009	This needs some amplification. Perhaps an explanation is required. Suggest a rewrite. "Where a major organisation has maintenance facilities in other member states the investigation and continued oversight of the approval shall be carried out in conjunction with the findings of the competent Authority of the member state in whose territory the other maintenance facilities are located". The reader will need to be told what will be the condition be on the major organisation if a Level 1 finding be dealt with? Some footnotes to M.B.601 would be of assistance.		Covered in AMC. No text change.
M.B.602 (a)	DGAC, France	162		Administrative procedures simplification There is no justification for the need for such formal acceptance which appears as pure administrative burden. The name of the management personnel is included in the organisation's manual and further more, the authority will not grant an approval if it is not satisfied that the requirements of M.A.606(a) and (b) are complied with. In addition according M.A.617, the authority has to be informed of any change of these personnel.	Already an existing JAA procedure for JAR 21, 145, OPS, 147. No text change.
M.B.602 (b)	CAA UK	123	Remove the word "commitment" as this is not defined		This is harmonised with Part-145. No text change.
M.B.602 (b)	CAA UK	123	It is recommended that B 602(b) should be changed to clarify the wording as follows:-The competent authority shall verify that the accountable manager has signed a confirmation statement and establish that the maintenance organisation manual procedures meet the requirements of Part M.A.Sub Part F.'		Only editorial differences exist between Part-145 and Part-M. No text change.
M.B.602 (d)	LBA	57	Change "exposition" to "manual" in accordance with M.A.604.		Text changed.
M.B.602 (d)	P. Doyer, AEI	034	This is a very important part of the initial approval. My question is - are there enough technical staff available in all member states to carry out this duty. I understand there are problems with the present M.A.S.T. teams to carry out the work required of them due to lack of staff. (See recent Top 10 JAA Meeting Report).		Paragraph content is not linked to competent authority resources or MAST visit participation. No text change.
M.B.602 (d)	Mike Newman, ALAE	009	This is a very important part of the initial approval. My question is – are there enough technical staff available in all member states to carry out this duty. I understand there are problems with the present M.A.S.T. teams to carry out the work required of them due to lack of staff. (See recent top 10 JAA Meeting Report)		Paragraph content is not linked to competent authority resources or MAST visit participation. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.602 (d)	CAA UK	123	It is also recommended that B 602(d) should be changed to clarify the wording as follows:- 'During the investigation for approval, the accountable manager must be seen at least once to ensure that he / she fully understands the significance of the confirmation statement and remains informed of any significant issues arising during the course of the approval process'.		Harmonised with maintenance Parts. No text change.
M.B.602 (d)	CAA UK	123	Should read "manual" instead of "exposition" for consistency across Sub Part F		Text changed.
M.B.602 (f)	LBA	57	A definition/handling procedure of "recommendations" should be available.		Not in context. No text change.
M.B.603	Allaert Kalshoven, Central JAA	030	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. 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. AAAA = Country designator (EU abbreviation issuing member state, EASA when issued directly by EASA) 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,		Harmonised with maintenance Parts. Text changed.
M.B.603 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.B.603 (a) to: "...an EASA Form 3 approval certificate (Appendix 5) which includes the ..."	Reference to Appendix 5 is missing.	Text changed.
M.B.604 (b)	P. Doyer, AEI	034	Audits every 24 months. Same question applies - are sufficient Inspectors available to all member states. It is no good writing rules if you cannot carry those rules out within a stipulated time. How will smaller competent Authorities cope?		Paragraph content is not linked to competent authority resources. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.604 (b)	Mike Newman, ALAE	009	Audits every 24 months. Same question applies – are sufficient Inspectors available to all member states. It is no good writing rules if you cannot carry those rules out within a stipulated time. How will smaller competent Authorities cope?		Paragraph content is not linked to competent authority resources. No text change.
M.B.604 (d)	P. Doyer, AEI	034	Meetings with accountable manager every 29 months. Are there sufficient staff to cope. Will some sort of flexibility be built into this requirement to extend the 24 months if company/organization is seen to be complying with all M.A. requirements?		The scheduled time frame is 24 months. No text change.
M.B.604 (d)	Mike Newman, ALAE	009	Meetings with accountable manager every 29 months. Are there sufficient staff to cope. Will some sort of flexibility be built into this requirement to extend the 24 months if company/organisation is seen to be complying with all M.A. requirements?		The scheduled time frame is 24 months. No text change.
M.B.605	Michel Ducamp FNAM France	171	We understand that immediate action be taken in presence of a level 1 finding, but this action needs common analysis of the situation between the Authority and the approved organisation. Appropriate decision may not be immediate limitation/suspension/revocation of the approval but conditional limitation/./. to short term corrective action. For level 2 findings, a 3 month time limit may not cover the variety of situations which could be encountered. Appreciation should be left to the Authority within the one year limit as stated in other parts of the Regulation.		Immediate action must be taken for a level 1 as it hazards an aircraft. The extension is authorised in the rule for level two findings. This concept of findings and levels are existing JAA concepts. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.605	DGAC, France	162	<p>"(a) When during audits or by other means evidence is found showing non-compliance to of the approved maintenance organisation with the Part-M requirement, any finding shall be classified as follows:</p> <p>1- Level 1 finding means any significant non-compliance with Part-M requirements which lowers the maintenance standard and hazards an aircraft.</p> <p>2- Level 2 finding means any non-compliance with the Part-M requirements which could lower the maintenance standard and possibly hazard an aircraft.</p> <p>(b) The competent authority shall confirm the findings in writing</p> <p>(1) within 3 working days for a level one finding</p> <p>(2) within 14 working days for a level two finding.</p> <p>(bc) The competent authority shall take the following actionsensure that the non compliance is corrected by the organisation within a period appropriate to the nature of the finding:</p> <p>1- For level 1 finding, immediate action shall be taken by the competent authority to revoke, limit or suspend, in whole or in part depending upon the extent of the level 1 finding</p>	<p><u>Impracticable</u></p> <p>- An automatic link between a level 1 finding and suspension of the approval may incite inspectors to only declare level 2 findings.</p> <p>- 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.</p> <p>- The audit should is just a picture of the system, and the conclusions should only be drawn by the initiator of the audit.</p> <p>- A decision to limit, suspend or revoke an approval comes more often from a body of findings rather than from an individual finding.</p> <p>- 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.</p> <p>- Under the national legal system, it is not always possible for an inspector</p>	<p>Level 1 findings and the actions required are defined in the rule and therefore should not be regarded as level 2 findings this means that the competent authority should support the decisions of its audit staff in processing potential safety related findings.</p> <p>No text change.</p>
M.B.605 (a)	CAA UK	123	"During audits or by other means" should be removed from the sentence as this has caused confusion.		Other means permits recording of findings during for example airworthiness reviews. No text change.
M.B.605 (b)	LBA	57	The description of the actions of the competent authority done for a level 1 finding should also be used in Part 145. Additional possibility of limitation of approval is mentioned in this paragraph.		Text changed in Part-145.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.605 (b) (1)	T. M. Gonzalez, Pratt & Whitney	084	Revise as follows: For level 1 finding, immediate action shall may be taken by the competent authority at its sole discretion to revoke, limit or suspend, in whole or in part depending upon the extent of the level 1 finding, the maintenance organisation approval, until successful corrective action has been taken by the organisation. <i>Comment:</i> There should be some discretion given to the competent authority on a level 1 finding to determine whether a revocation or suspension is appropriate rather than increased oversight or other action. There will be instances when continued operations are necessary to solve a problem and support the fleet.		In certain safety related cases the sanctions must be made mandatory. No text change.
M.B.605 (b) (1)	Aerospace Industries	170	as follows: For level 1 finding, immediate action shall may be taken by the competent authority at its sole discretion to revoke, limit or suspend, in whole or in part depending upon the extent of the level 1 finding, the maintenance organisation approval, until successful corrective action has been taken by the organisation. <i>Comment:</i> There should be some discretion given to the competent authority on a level 1 finding to determine whether a revocation or suspension is appropriate rather than increased oversight or other action. There will be instances when continued operations are necessary to solve a problem and support the fleet.		In certain safety related cases the action must be made mandatory. No text change.
M.B.606 (a)	LFV, Sweden	105	Definition is required of "direct approval" and "indirect approval".		Text changed.
M.B.606 (b)	P. Doyer, AEI	034	Suggest that all words after "changes" be deleted. A manual amendment should never warrant a small organization closure. A person's livelihood is at stake here. It may cut across European Employment Law and Human Rights.		This paragraph does not mandate that a manual amendment warrants closure of an organisation. No text change.
M.B.606 (b)	LBA	57	Add a headline "other changes" to this subparagraph to have the equal layout as subparagraph M.B.606(a).		Text changed but not as proposed.
M.B.606 (b)	Mike Newman, ALAE	009	Suggest that all words after "changes" be deleted. A manual amendment should never warrant a small organisation closure. A person's livelihood is at stake here. It may cut across European Employment Law and Human Rights.		This paragraph does not mandate that a manual amendment warrants closure of an organisation. No text change.
M.B.606 (b)	CAA UK	123	For better clarity, add heading to B 606(b) which reads "(b) Changes to the approved maintenance organisation". Again, for better clarity, add the words to the content of B 606(b) "...as listed in M A.617.." after "...during such changes.."		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.607	DGAC, France	162	"The competent authority shall suspend an approval on reasonable grounds in the case of potential safety threat, or; may suspend, revoke or limit an approval pursuant to M.B.605if (a) the organisation is not able to ensure compliance with Part M; or (b) the organisation does not remain in compliance with the conditions of approval, in particular the provisions included in the maintenance organisation manual; or (c) the organisation has gone beyond its scope of approval; or (d) the competent authority has not been granted access to the organisation to determine continued compliance with Part M."	Impracticable: 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 which circumstances.	In certain safety related cases the action must be made mandatory. No text change.
M.B.701 (a)	LBA	57	Add in the list of documents the "Continuing Airworthiness Management Organisation Exposition" It is part of the application documents.		Text changed.
M.B.701 (a)	LBA	57	Delete the word "also". It is not needed.		Text changed.
M.B.701 (b)	Ralph Schütte, Lufthansa Germany	150	For aircraft being not in a controlled environment according M.A. 902 (b) the approved continuing airworthiness review staff, shall carry out a physical survey of the aircraft...	Argument: Aircraft in a controlled environment are continuously under surveillance. The listed physical check items are part of a normal maintenance program and will be checked periodically(No value added)	Not applicable to this paragraph. No text change.
M.B.701 (b)	Ralph Schütte, Lufthansa Germany	025	Where facilities are located in more than one Member State the investigation and continued oversight of the approval shall be carried out by that member state in which the major activities of the organisation concerned take place.	It is unpractical to perform the continued oversight over line stations of an operator/maintenance organisation by other than the Member State surveying the homebase.	Text changed.
M.B.701 (b)	Lufthansa AG Germany	021	Where facilities are located in more than one Member State the investigation and continued oversight of the approval shall be carried out by <u>that Member State in which the major activities of the organisation concerned take place.</u>	Argument: It is unpractical to perform the continued oversight over line stations of an operator/maintenance organisation by other than the Member State surveying the homebase.	Text changed.
M.B.702 (a)	LBA	57	"M.A.708(a)" should be changed to "M.A.706(a). There is no personnel mentioned in M.A.708(a). It seem the reference is wrong.		Text changed.
M.B.702 (a)	LBA	57	"M.A.706(d)" should be added after "M.A.706(c)" twice. Personnel of M.A.706(d) shall be accepted, too.		Text changed.
M.B.702 (a)	Manfred Bialonczyk, BMVIT	081	Change reference in M.B.702 (a) from "M.A.708 (a)" to " M.A.706 (a) ".	Wrong reference.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.702 (a)	DGAC, France	162		Administrative procedures simplification There is no justification for the need for such formal acceptance which appears as pure administrative burden. The name of the management personnel is included in the organisation's manual and further more, the authority will not grant an approval if it is not satisfied that the requirements of M.A.706(b), M.A.706 (c) and M.A.707 are complied with. In addition according M.A.713, the authority has to be informed of any change of these personnel.	Already an existing JAA procedure for JAR 21, 145, OPS, 147. No text change.
M.B.702 (f)	CAA UK	123	For clarity, remove "closure actions", place a comma and remove brackets surrounding "actions required, etc...".		Harmonised with Part-145. No text change.
M.B.703	CAA UK	123	We recommend that all approved organisations are issued with an approval certificate in the same format (ECAR Form 3) as the Form 14 is inadequate for the task.		Form 3 is a Part-145 or Part-M approval certificate and form 14 in appendix 6 is the equivalent to the form 14 in the JAA system. No text change.
M.B.703	Allaert Kalshoven, Central JAA	030	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. 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 App		Harmonised with maintenance Parts. Text changed.
M.B.703 (a)	LBA	57	The reference should be changed to "EASA Form Fourteen (Appendix 6)".		Text changed.
M.B.703 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.B.703 (a) to: "...an EASA Form 14 approval certificate (Appendix 6) which includes the ..."	Reference to Appendix 6 is missing.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.703 (a)	LBA	57	change "14" to "fourteen"		No text change.
M.B.703 (c)	LBA	57	The approval reference number should be standardized for all approvals (Subpart F, Subpart G, Part 145, Part 66 and Part 147). A List of the abbreviations for the member states should be published in AMC material.		Harmonised with maintenance Parts. Text changed.
M.B.703 (d)	Manfred Bialonczyk, BMVIT	081	M.B. 703(d) change text to "...EASA Form 14 becomes part of the air operators certificate."	Form 14 data are not relevant to the flight crew. In the case of commercial air transport, the AOC will only be issued if Subpart G approval process is finalised. Content of Form 14 is incorporated in the continuing airworthiness management organisation exposition.	This is implicit, however further clarification is presented in the AMC. No text change.
M.B.704	LBA	57	A definition for recommendations should be given and a procedure for the handling of recommendations by the competent authority should be mentioned.		Unfortunately no reference to this subject can be found in this paragraph. No text change.
M.B.704 (b)	LFV, Sweden	105	M.B.704 (b) reads: "each organization shall be completely audited at periods not exceeding twelve months." We propose the following text: " At periods not exceeding 24 months". The audit period was discussed at several meetings and it is our opinion that 24 months should be sufficient instead of every 12 months. We believe since the competent authority shall develop a survey programme to monitor the status of the fleet of aircraft on its register (M.B. 303) and survey a relevant sample of the aircraft managed by the Subpart G approved organization in every 12 months (M.B. 704), this will indeed give an indication on how the CAMO's comply with the rules. To conduct complete audits within 12 months will create additional workload and since in addition to the present JAR-OPS Subpart M organizations we now also have to face many new CAMO organizations. In Sweden there are 50-60 organisations varying from "one man" organizations and up that will now be forced to apply for a CAMO approval. Today these are aud		Text changed.
M.B.704 (b)	LBA	57	Why 12 months and not 24 months as in other Parts? (145, 21) "...in every twenty-four months..."		Text changed.
M.B.704 (b)	DAC Luxembourg	129	<i>Each organisation shall be audited at a period not exceeding 12 months</i> <i>Each organisation shall be audited at a period not exceeding 24 months</i>		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<i>Comment : The change from JAR codes to EASA could have been the opportunity to choose the same period for the two audits. DAC Lux suggests 24 months for both.</i>		
M.B.704 (c)	Mike Newman, ALAE	009	Same question applies. Will the competent Authorities have sufficient staff to carry out these calendar inspection requirements. What happens if it is physically impossible to carry out the requirements of 704? Will E.A.S.A. shut down the organisation that they cannot audit?		Paragraph content is not linked to competent authority resources. No text change.
M.B.704 (c)	P. Doyer, AEI	034	Same question applies. Will the competent Authorities have sufficient staff to carry out these calendar inspection requirements. What happens if it is physically impossible to carry out the requirements of 704? Will E.A.S.A. shut down the organisation that they cannot audit?		Paragraph content is not linked to competent authority resources. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.705	DGAC, France	162	<p>“(a) When during audits or by other means evidence is found showing non-compliance to the approved continuing airworthiness management organisation the Part-M requirement, any finding shall be classified as follows:</p> <p>1- Level 1 finding means any significant non-compliance with Part-M requirements which lowers the maintenance standard and hazards an aircraft.</p> <p>2- Level 2 finding means any non-compliance with the Part-M requirements which could lower the maintenance standard and possibly hazard an aircraft.</p> <p>(b) The competent authority shall confirm the findings in writing</p> <p>(1) within 3 working days for a level one finding</p> <p>(2) within 14 working days for a level two finding.</p> <p>(bc) The competent authority shall take the following actions ensure that the non compliance is corrected by the organisation within a period appropriate to the nature of the finding:</p> <p>1- For level 1 finding, immediate corrective action shall be taken by the competent authority to revoke, limit or suspend, in whole or in part depending upon the e</p>	<p><u>Impracticable</u></p> <ul style="list-style-type: none"> - 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 is just a picture of the system and 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 immediate 	<p>Level 1 findings and the actions required are defined in the rule and therefore should not be regarded as level 2 findings this means that the competent authority should support the decisions of its audit staff in processing potential safety related findings.</p> <p>No text change.</p>
M.B.705	LBA	57	A definition for recommendations should be given and a procedure for the handling of recommendations by the competent authority should be mentioned.		Unfortunately no reference to this subject can be found in this paragraph. No text change.
M.B.705 (a) (1)	Manfred Bialonczyk, BMVIT	081	M.B.705 (a) 1 and 2 replace "maintenance standard" by “ safety standard ”	Should be changed due to consistency with M.B. 303 (g)	Text changed.
M.B.705 (b)	LBA	57	The description of the actions of the competent authority done for a level 1 finding should also be used in Part 145. Additional possibility of limitation of approval is mentioned in this paragraph. Additional possibility of limitation of approval is mentioned in this paragraph.		Text harmonised in Part-145.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.705 (b) (1)	Martin Ambrose, ERA	079	This paragraph gives the competent authority the right to revoke, limit or suspend the continuing airworthiness management approval of the G1 organisation. If the worst happened and the approval was withdrawn, can the Agency advise what impact this would have on the fleet of the operator?		This would result in suspension or revocation of the AOC and would lead to the fleet being grounded. No text change.
M.B.705 (b) (1)	T. M. Gonzalez, Pratt & Whitney	084	Same comments as M.B.605(b)1.		In certain safety related cases the action must be made mandatory. No text change.
M.B.705 (b) (1)	Aerospace Industries	170	as follows: For level 1 finding, immediate action shall <u>may</u> be taken by the competent authority at its sole discretion to revoke, limit or suspend, in whole or in part depending upon the extent of the level 1 finding, the maintenance organisation approval, until successful corrective action has been taken by the organisation. <i>Comment: There should be some discretion given to the competent authority on a level 1 finding to determine whether a revocation or suspension is appropriate rather than increased oversight or other action. There will be instances when continued operations are necessary to solve a problem and support the fleet.</i>		In certain safety related cases the action must be made mandatory. No text change.
M.B.706 (a)	LFV, Sweden	105	Definition is required of "direct approval" and "indirect approval".		Text changed.
M.B.706 (b)	LBA	57	Add a headline "other changes" to this subparagraph to have the equal layout as subparagraph M.B.706(a).		Text changed but not as proposed.
M.B.706 (b)	P. Doyer, AEI	034	Delete all words after the word "changes" in line 3. It would be inappropriate to close down an organisation when such changes are to be made.		This paragraph does not mandate that a manual amendment warrants closure of an organisation. No text change.
M.B.706 (b)	Mike Newman, ALAE	009	Delete all words after the word "changes" in line 3. It would be inappropriate to close down an organisation when such changes are to be made.		This paragraph does not mandate that a manual amendment warrants closure of an organisation. No text change.
M.B.706 (b)	CAA UK	123	For clarity, add heading to B 706(b) which reads "(b) Changes to the approved maintenance organisation" Again, for better clarity, add the words to the content of B 706(b) "...as listed in M A.713.." after "...during such changes.."		Text changed but not as proposed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.707	DGAC, France	162	<p>"The competent authority shall</p> <p>a) suspend an approval on reasonable grounds in the case of potential safety threat, or;</p> <p>b) may suspend, revoke or limit an approval pursuant to M.B.705 if:</p> <p>(a) the organisation is not able to ensure compliance with Part M; or</p> <p>(b) 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>(c) the organisation has gone beyond its scope of approval; or</p> <p>(d) the competent authority has not been granted access to the organisation to determine continued compliance with Part M.."</p>	Impracticable: 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.	In certain safety related cases the action must be made mandatory. No text change.
M.B.902	H.T. Beekelaar, Martinair	008	M2.708 Renewal Keeping the ECAR 66 licenses current		Currency of licenses is dealt with in Part-66. No text change.
M.B.902	H.T. Beekelaar, Martinair	008	See remarks at Subpart G.1 for keeping ECAR 66 licenses current		Currency of licenses is dealt with in Part-66. No text change.
M.B.902 (a)	ENAC, Italy	102	When the competent authority decides to carry out the airworthiness review and issue the airworthiness review certificate, the competent authority shall carry out an airworthiness review in accordance with the prescriptions of M.A.710. <u>A flight test may additionally be performed to assess the airworthiness of the aircraft . With this modification the competent authority shall investigate and may request further information and/or a flight test to support the assessment of the recommendation.</u>		Dealt with in AMC. No text change.
M.B.902 (a)	Manfred Bialonczyk, BMVIT	081	Change text in M.B.902 (a) to: "...review certificate (Appendix 3 - EASA Form XXb), the competent ..."	Reference to Appendix 3 - EASA Form XXb is missing.	Text changed.
M.B.902 (a)	CAA UK	123	Replace 'For every aircraft' with 'For each aircraft managed'. The original wording is considered misleading.		Unfortunately no reference to this subject can be found in this paragraph. No text change.
M.B.902 (b) (1)	LBA	57	The competent authority should have the possibility to deviate from the experience requirements for its personnel if other proven experience exists.		Experience requirements are explicit. No text change.
M.B.902 (b) (2)	Manfred Bialonczyk, BMVIT	081	The text in M.B.902 (b)(2) should read: ... an appropriate Part 66 qualification or...	The appropriate qualification according Part 66 is not always a license! (e.g. balloons, gliders)	Dealt with by equivalent. No text change.
M.B.902 (b) (2)	CAA UK	123	Insert '(on form XXb)' after 'certificate'. Replace the word 'license' with 'qualification'.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
M.B.902 (b) (2)	ENAC, Italy	102	"Airworthiness review by the competent authority" point (c) is not consistent with point (b)2 since there is a specific requirement to maintain details of any Part 66 licence but not of any relevant aeronautical degree.		Text changed.
M.B.902 (b) (3)	LBA	57	A definition of the wording "formal aeronautical maintenance training" is needed. It should be explained, that this training does not need to be type related.		Detailed in AMC. No text change.
M.B.902 (c)	IVW, The Netherlands	99	Editorial: CAA-NL suggests to delete the words "aircraft maintenance" in reference to the Part 66 aircraft maintenance license as used everywhere else in the text.		Text changed.
M.B.902 (d)	ENAC, Italy	102	M.B. 902 (d) should be replaced by: the person or organisation accountable under M.A. 201 shall make arrangements that allow the competent authority to make any investigations, flight tests included, deemed necessary.		Covered in M.A.902. No text change.
M.B.902 (d)	Manfred Bialonczyk, BMVIT	081	The text should read: ... have access to applicable M.A Subpart C and M.A.402 data in the ...	Reference to M.A.402 missing.	Text changed.
M1	Europe Air Sports	73		<p>In some countries the national air sport association or federation, in the form of a National (air sport) Governing Body (NGB), or the national aero club (NAC) is the current "competent authority" in respect of oversight of continuing airworthiness of individual aircraft and issue of airworthiness review certificates, and / or oversight of a maintenance organisation (Sub part F), and / or approval of maintenance programmes either on a delegated basis from the NAA or on a stand alone basis (e.g. BGA for UK gliding).</p> <p>In this introductory section to Part M it needs to be recognised that the "competent authority" should not be limited to the National Aviation Authority (e.g. UK CAA, German LBA, French DGAC), but could equally be the NGB or NAC.</p> <p>The concept of such bodies taking on these roles, without necessarily a sub delegation from an NAA, is foreseen in Regulation 1592 in the term "qualified entity".</p> <p>EAS strongly recommends an amendment to the M1 section of Part M to reflect this intention and possibility.</p>	<p>M.1 places no limitations. A Member State may designate the organisation it wishes as a competent authority is they do today. This paragraph allows today oversight systems to continue if the Member States wish.</p> <p>No text change.</p>

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