

CRD - AMC to Part 147

Comment	Response
147.A.30	
Paragraph (i) 2	
Cmt. 25 / LBA, Germany	
Replace '...for both large and small aircraft..' with '...for large and small aircraft and airships', because airships are also part of this paragraph.	As there is no Part-66 syllabus defined, training and examinations on aircraft other than aeroplanes and helicopters are not part of the privileges as specified in 147.A.70. No text changed.

Comment	Response
147.A.35	
Paragraph (f)	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: The definition appears to be essential for the implementation of the rule and thus should be included in the rule of Part 147.</p>	<p>This is not a definition. Text not changed.</p>
Paragraph (g)	
Cmt. 29 / CAA-UK	
<p>It is not possible to determine how 'a responsible attitude' can ensure 'the highest integ without being able to measure the responsible attitude. Since this cannot be determine during an audit, this statement should be deleted.</p>	<p>This is AMC 147.A.100(b). Existing JAA AMC text. No text changed.</p>

Comment

Response

147.A.60

Paragraph (b)

Cmt. 29 / CAA-UK

The paragraph contains the term, 'member state authority'. This is not a defined term, it should either be Member State or Competent Authority.

Text changed.

Comment

Response

147.A.65

Paragraph para 2

Cmt. 34 / ASA Sweden

The AMC seems to contain an exception from the requirement in 147.A.65, meaning that this AMC (AMC 147.A.65 para 2) contains a requirement. Delete the paragraph and insert the requirements in Part 147 or change the wording to clarify the non-mandatory status of the AMC.

Text changed.

Comment	Response
147.A.70	
Paragraph (d)	
Cmt. 29 / CAA-UK	
Paragraph 1 includes a reference to a 'pre audit procedure'. This guidance material should define what a pre audit procedure consists of. This terminology is not expressed in IR14	The pre-audit has been transferred to AMC 147.A.60. This clarifies the issue. Text changed.
Paragraph (d) 3	
Cmt. 18 / DGAC, France	
§ 2.18 does not exist in the Appendix 1 of the AMC 147. Need to be added.	Text changed.

Comment	Response
147.A.85	
Paragraph	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part 147).	This is existing AMC text to JAR-147. No text changed.
Paragraph (b)	
Cmt. 16 / Lufthansa Technik	
The requirements specifying Type Training Courses have been upgraded from Guidance Material (TGL 40) to AMC Material thus confronting the industry with new requirements. As this AMC is written, it can be interpreted (and is already interpreted) by competent authorities of member states in a way that qualification of certifying staff cannot any longer be conducted in more than one step. As a matter of fact most maintenance organisations in the airline industry have established qualification-schemes over the past decades for their mechanics and technicians (under JAR-145: authorization for work performance) and need to qualify this population by "delta"-type-rating-courses onto the required level of Part-66 and Part-147 once they shall be nominated and licensed as certifying staff. A full – ab initio - training is not necessary as this personnel has already been trained but to a lower level than B1 or B2 years before and has gained a lot of experience on the aircraft type concerned. As this AMC Material is written, it can be understood, that only one conclusive (and complete) type rating course and examination will be accepted (except modular setup according to AMC 147.A.105.).	Existing JAA text thoroughly discussed and accepted b\y the JAA and interested parties. No text changed.
Paragraph (d)	
Cmt. 29 / CAA-UK	
This material relates to the privileges of an approved organisation which is included in IR147.70. This AMC should be re-titled as AMC 147.70(d)	This is not related to privileges but related to insuring the practical training of an approved training course in adequately carried out in case of sub-contracting. Text not changed.
Paragraph (d) para 1	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a requirement ("...must..."). Delete the paragraph and insert the requirements in Part 147 or change "must" to "should"	Text changed.
Paragraph (g)	
Cmt. 18 / DGAC, France	
Conversion training duration should be included in appendix 1 of PART 147 4.JUSTIFICATION: See comment DGAC France 93 on Appendix 1 of Part 147	The courses duration proposed in comment 93 are not consistent with the course syllabus as specified in Appendix 1 to Part 66. Text not changed. Conversion courses duration are specified in the AMC based on existing JAA text. Text not changed

Comment

Response

147.A.100

Paragraph (a)

Cmt. 34 / ASA Sweden

The AMC seems to contain a requirement ("...must...").
Delete the paragraph and insert the requirements in Part 147 or change "must" to "shou

Text changed.

Comment	Response
147.A.105	
Paragraph 5	
Cmt. 25 / LBA Germany	
Add the new ATA chapter '44', because this chapter '44 cabin systems' was added last by ATA.	<p>This is the existing JAR ATA reference that will have to be reviewed by EASA in the future.</p> <p>No text changed.</p>

Comment	Response
147.B.210	
Paragraph	
Cmt. 18 / DGAC, France	
<p>To clarify the audit expected, the AGM section part 2 chapter 27 §2.8 should be introduced in this AMC. "It is not necessary to sample all basic and type training course that will be approved, but it is necessary to sample, as appropriate, one basic and one type training course ..."</p> <p>The use of the "JAA form 22" should be recommended, and the form attached to the AMC.</p> <p>4.JUSTIFICATION: Standardisation.</p>	<p>Item 1: This is addressed in GM 147.B.210. No text changed.</p> <p>Item 2: Text changed.</p>

Comment	Response
147.B.215	
Paragraph	
Cmt. 20 / CAA Netherlands	
Typo : Renewal, all approvals will be unlimited?	This is in the rule. No text changed.
Cmt. 25 / LBA, Germany	
Delete paragraph because the certificate shall be unlimited according 147.A.80.	Text changed.

Comment	Response
Appendix 1	
Paragraph	
Cmt. 18 / DGAC, France	
§ 2.18 does not exist in the Appendix 1 of the AMC 147. Need to be added.	Text changed.
Paragraph 4	
Cmt. 25 / LBA, Germany	
Replace 'Part(s)' with 'regulation/Part(s)', because this makes it possible to use the same manual also for third country approval.	This is not in the AMC. Only organisations approved through Parts can make combined expositions. No Text changed.
Paragraph MTOE part 3 subp 3.3	
Cmt. 30 / KLM E&M	
Part 3, subp. 3.3 " Analysis of examination results" We would very much like to see more specifics in what is meant by "analysis", possibly also by referral to other rulemak	This is existing AMC to JAR-147 text. No text changed.

Comment

Response

Appendix 2

Paragraph

Cmt. *11 / Foca Switzerland*

EASA Form 4 shall be formatted such that it can be used under all Parts that require acceptance of Management Personnel by the Competent Authority, i.e. Part 145, Part 147, Part 21/Subpart G, Part M/Subpart F.

Text changed.

Comment	Response
<i>Other</i>	
Paragraph	
Cmt. 11 / Foca Switzerland	
<p>For the sake of standardisation, the AMC paragraphs of the various Parts relating to the same systemic procedures shall be written in consistent manner (same wording), i.e. for the initial certification of organisations, for the conduct of audits, for the processing of findings, for the limitation/suspension/revocation of approvals etc., be it i.a.w. Part 145, Part M/Subpart Part 147, Part 21/Subpart G.</p> <p>Forms containing the same kind of information shall have a consistent format throughout all Parts they are used for, i.e. page 1 of application form (EASA Form 2), EASA Form 4 (acceptance of management personnel), page 1 of approval certificates, page 1 of approval recommendation reports (EASA Form 6/6F)</p> <p>AMC & GM paragraphs on organisation expositions/manuals (MOE, MOM, MTOE, POE) shall be written in consistent manner (same wording), i.e. guidance to structure, amendment and approval procedures etc. This is especially important in case an organisation, applying for several approvals, establishes joint management chapters of expositions/manuals.</p> <p>Options for the unlimited/limited issue of certificates shall be consistent for all kinds of organisation approvals.</p>	<p>This review will be carried out by the agency as soon as a consolidated text is available for adoption.</p>
Paragraph ECAR 147 and AMC	
Cmt. 30 / KLM E&M	
<p>147.A.10 Definitions It would be very beneficial to have the definitions returned that were under JAR 147.10 In addition to that, there is a great need to have the proper definitions (esp. Responsibilities, Tasks and Competences) of the Instructors, the Examiners and the Assessors.</p>	<p>Necessary definition are in the regulation and not in the Parts. No text changed.</p>

Comment	Response
General Comments	
Paragraph	
Cmt. 18 / DGAC, France	
As AMC's are not mandatory, the terms "must", "shall" and perhaps "should", should be removed from the text. The use of the expression "may" would prevent any confusion introduced by ambiguous terms.	Text reviewed and changed where applicable.
Cmt. 29 / CAA-UK	
To properly consider the validity and applicability of this AMC material, it is essential to carry out this task in conjunction with the implementing rule Part 147. As this has not been possible, the comments made on the AMC material are based upon CAA comments made on IR 147.	The AMC are Agency documents and can therefore be amended through a process deferring for the EU decision making process.
Once IR 147 has been agreed it will be necessary to carry out a further review and reconsider the contents of this AMC Material.	No text changed.
Cmt. 34 / LUFTFARTSVERKET, Aviation Safety Authority (ASA)	
Regulation (EC) No 1592/2002 article 56.2 reads: "During an additional transition period of 42 months from the date referred to in paragraph 1, Member States may continue to issue certificates and approvals by way of derogation from the provisions of Articles 5, 6, 9 and 15 under the conditions specified by the Commission in the implementing rules adopted for their application....." The time aspect is a general problem that has to be addressed. The time given for consultation have been too short considering that the material is extensive and that acceptable means of compliance (AMC) and guidance material (GM), as well as the proposed implementing rules need more review before they can be considered ready for adoption. The entry into force dates in general does not allow neither authorities nor the market enough time to adjust. This can have serious effects on the industry and certain activities may have to shut down. We cannot accept this to happen because enough time is not allowed and this could definitely not have been the purpose. We therefore recommend that the 42 month transition period is used to give everyone involved reasonable time to adjust and prepare.	The transitional aspects are addressed in the regulation. Once it is published, the associated AMC supporting it also need to be published. The AMC are Agency documents and can therefore be amended through a process deferring for the EU decision making process.
	No text changed.

Comment	Response
<p>Cmt. 34 / ASA Sweden</p> <p>Documents in general need an editorial review in regard of language and consistency, for example:</p> <p>The titles of the drafted material should have the same structure. There is total inconsistency in whether the titles of the drafted material (in this case both the Implementation Rules and the Acceptable Means of Compliance and Guidance Material) shall be written with or without the "-" between the word "Part" and the specific letter or number of each part, i.e. M, 66, 145 or 147.</p> <p>All AMC or GM paragraph numbers should have the same structure. At present they are different in different Parts. GMs to Part 145 are called "GM (a paragraph)", see for example GM 145.A.70 (a), whereas GMs to Part 147 are called "Guidance to (a paragraph)", see example Guidance to 147.A.1.</p> <p>All AMC and GM headings should be the same as those of the requirements that they are referring to. In the drafted material, there are AMCs and GMs with a different heading than the requirement that they refer to. For example, some AMCs contain headings that have been shortened (see AMC M.A. 606).</p> <p>Regarding appendices, the following should apply:</p> <ul style="list-style-type: none"> - Appendices should be avoided. Forms and such should be inserted under an AMC or a GM. - If it is necessary to use appendices, there should be a reference in an AMC or a GM to an appendix that can be found in the material. Frequently, there are appendices attached to the material where no reference can be found in the AMCs or GMs. - In the heading of all appendices, and preferably on all pages included in an appendix, it should be clearly indicated that the appendix or page forms part of an AMC (see for example both appendices, Appendix 1 and Appendix 2, to AMC and GM to Part 145, where nothing indicates that their provisions contain acceptable means of compliance). - In order to provide acceptable means of compliance or guidance material that is easy to recognise for all users, all forms should retain their original numbers. - It is also preferable that all relevant forms which have been developed by JAA are inserted in the AMC/GM-material. Thus, "Form 12" for the application of a 147-organisation approval, should be inserted in the AMC material for Part 147. 	<p>This review will be carried out by the agency as soon as a consolidated text is available for adoption.</p>