

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.10	Rolls Royce, Germany	65	Part 145 by definition is intended to be applicable for Maintenance organizations in general. The requirements for Maintenance organizations should not be split and covered by two different parts. Part M should address how maintenance has to be done and Part 145 should govern the prerequisites for approval of Maintenance organizations and their operation.		Due to bilateral issues and issues associated with repealing Regulation (EEC) No 3922/91 in article 57 of the Basic Regulation it has been determined to separate the two elements. No action required.
145.A.10	CAA, UK	123	There should be a reference to the Scope definition in Part M which details when a Part 145 approval is needed		Requirement for when a Part-145 approval is required is detailed in Part-M. There is no need to make a reference in Part-145. No action required.
145.A.10	Maintenance Division JAA	12	Suggest rephrasing as follows: <b><i>This section establishes the general operating rules and the requirements to be met by an organisation to qualify for the issue or continuation of an approval for the maintenance of aircraft and/or aircraft components.</i></b>	This is not accurate and is not consistent with Part B terminology.	Text changed.
145.A.15	Maintenance Division JAA	12	There is no such word as "issuance". This should be replaced by <b><i>"the issue"</i></b> .		Text changed.
145.A.15	British Airways Maintenance Cardiff	97	Application should be made to the competent authority in a form and manner established by such authority.	This is likely to lead to inconsistency across a number of different authorities. A standard format should be agreed.	AMC details the form to be used to meet this requirement. No text changed.
145.A.20	DGAC, France	162	(b) For the aircraft maintenance, the organisation shall specify for each aircraft rating and associated limitations, the level of maintenance associated: "Base Maintenance" and/or "Line Maintenance". Aircraft maintenance must be classified as "Base maintenance" in the following conditions: Aircraft major and heavy Maintenance checks (ex: C and D checks), Light aircraft Maintenance depending on the aircraft type (ex: A check for heavy aircraft), Major modifications, repairs or structural inspections which need the use of aircraft hangar and associated facilities and equipment, All aircraft maintenance activities which need structured technical teams management and a significant production staff (10 persons and more), All aircraft maintenance activities which last more than 10 hours and/or which must be performed by several maintenance shifts."	Implementation problem "Line maintenance" and the "Base maintenance" are referred to in different paragraphs of Part 145 without being defined. JAA TGL 2 defines by default the "Line maintenance" as simple aircraft checks (i.e. daily check, weekly check and A check in certain case), rectification, simple modifications and repairs to be performed between 2 flights. This is not sufficient, and facilities, management staff, production staff, special tools/equipment needed and the duration of the maintenance activity must also be taken into account. For example, an A check with several works to perform (deferred items, component changes, modifications, AD..) on a heavy aircraft need to be performed in a hangar with all associated means and must be released by a 66 category C certifying staff. This type of maintenance activity must not be considered in any case by the maintenance organisations and operators as "line	AMC defines base maintenance and line maintenance and is a transposition of TGL 2. No text changed.

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				maintenance". A Maintenance organisation which is responsible to perform all maintenance works betwe	
145.A.20 (1)	LFV, Sweden	105	It is assumed that the reference should be 145.A.30.B.2.		No such reference in 145.A.20. No text changed.
145.A.25	European Regional Airlines Assoc. (ERA)	079	Now that this text has moved from AMC to the rule, the Agency should set some guidelines and definitions for terms used this paragraph such as "appropriate", "undue discomfort" etc.		Subjective elements removed. Text changed although not as proposed.
145.A.25 (a)	DGAC, France	162	(1) For base maintenance of aircraft, aircraft hangars are both permanently available and large enough to accommodate aircraft on planned base maintenance; (2) For line maintenance of aircraft, hangars are accessible within appropriate time (3) For component maintenance, component workshops are large enough to accommodate the components on planned maintenance."	Implementation problem For Base Maintenance, it must be crystal clear that permanent facilities are available. For Line Maintenance, interventions between two planned works in case of inclement weather and/or for significant work and/or defect rectification may require appropriate shelter. Therefore, the availability of aircraft hangar shall be contracted permanently or on request (with a determined delay of disposal) for line maintenance depending on specific situation (type and number of aircraft maintained, distance from main base maintenance facilities, ...).	Already covered in rule and clarified by AMC material. No text changed.
145.A.25 (b)	DLH Germany	21	Office accommodation is provided for the management of the planned work referred to in paragraph (a), including management, planning, technical records, quality (or certifying staff) so that they can carry out.... delete:	There is no basic requirement for office accommodation for certifying staff; for example during line maintenance on the ramp the office may be substituted by a car or else. In some	Office accommodation for certifying staff is considered part of the facilities requirement. No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			certifying staff	cases like base maintenance there may be an office accommodation necessary for certifying engineers only.	
145.A.25 (b)	LBA	053	change "or" to "and" "The quality and certifying staff are employed by the organisation.		Text changed.
145.A.25 (b)	BDLI	148	Office accommodation is provided for the management of the planned work referred to in paragraph (a), including management, planning, technical records, quality (or certifying staff) so that they can carry out.... delete: certifying staff	There is no basic requirement for office accommodation for certifying staff; for example during line maintenance on the ramp the office may be substituted by a car or else. In some cases like base maintenance there may be an office accommodation necessary for certifying engineers only.	Office accommodation for certifying staff is considered part of the facilities requirement. No text changed.
145.A.25 (c) (1)	Aircraft Electronics Assoc. (AEA)	049	Recommended Changes: delete "without undue discomfort".	The statement that the "temperature must be maintained such that personnel can carry our required tasks without undue discomfort" is ambiguous and is not focused on aviation safety. In addition, while the focus of 145.A,25 should be inside of the facilities, some NAA have interpreted that to include ramp operations. Limiting ramp maintenance to only when temperatures are not uncomfortable is unacceptable. The focus of paragraph (1) should be aviation safety, that is, the temperature should be maintained or personal equipment should be used, so that the required task can be performed safely.	Text changed.
145.A.25 (c) (1)	GAMTA	151	The statement that the "temperature must be maintained such that personnel can carry out required tasks without undue discomfort" is ambiguous and is not focused on aviation safety. In addition, while the focus of 145.A,25 should be inside of the facilities, some NAA have interpreted that to include ramp operations. Changes: delete "without undue discomfort"	Limiting ramp maintenance to only when temperatures are not uncomfortable is unacceptable. The focus of paragraph (1) should be aviation safety, that is, the temperature should be maintained or personal equipment should be used, so that the required task can be performed safely.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.25 (c) (2)	Aircraft Electronics Assoc. (AEA)	049	Recommended Change: Add the word "excessive" before the word "dust and other airborne contaminants" in the first sentence. Delete the words "aircraft/component" before the words "surface contamination is evident".	The provisions of paragraph (c) (2) are acceptable for components however, overly restrictive for aircraft. The limitation of paragraph (c) (2) such that dust must be minimized and that any visible dust on an aircraft is an indicator of surface contamination is overly restrictive. General aviation hangars do not stop dust from accumulating on aircraft and as such every GA hangar throughout Europe is in violation of this requirement. In addition, the amount of surface contamination that creates a safety hazard is significantly different for a component than an aircraft.	1 Excessive is subjective and therefore cannot be quantified. No change. 2 Evidence of surface contamination is a means of quantifying the contamination. No text changed.
145.A.25 (c) (3)	Aircraft Electronics Assoc. (AEA)	049	Recommended Changes: Add a second paragraph which reads: If portable lighting is utilized for inspections and/or maintenance tasks, a description of the portable lighting should be included in the exposition.	Paragraph (c) (3) implies fixed lighting only. The requirements for lighting must include both fixed and portable lighting. If the AMO elects to utilize portable lighting a description of the various lighting systems should be included in the exposition	A difficult requirement to implement. No text changed.
145.A.25 (c) (3)	GAMTA	151	Paragraph (3) implies fixed lighting only. The requirements for lighting must include both fixed and portable lighting. If the AMO elects to utilize portable lighting a description of the various lighting systems should be included in the exposition. Recommended Changes: Add a second paragraph which reads: If portable lighting is utilized for inspections and/or maintenance tasks, a description of the portable lighting should be included in the exposition.		A difficult requirement to implement. No text changed.
145.A.25 (c) (4)	European Regional Airlines Assoc. (ERA)	079	This paragraph is attempting to limit noise levels.	In and industry that can, at certain times, be very noisy, (running engines, riveting etc), how does the Agency plan to quantify at what point a noise becomes "distracting?"	Subjective elements removed. No text changed.
145.A.25 (c) (6)	Mike Newman	40	First sentence is acceptable. The second sentence should be amended as suggested. "The senior person on duty at the time that weather conditions deteriorate to unacceptable limits in respect of temperature, moisture, hail, ice, snow, wind, light, dust or other air borne contamination shall suspend all maintenance or inspection tasks until satisfactory conditions are re-established. Persons delegated to make such decisions will be appended to the maintenance exposition	Unless a senior person is delegated to curtail inspections due to weather, this action will go out of the window. No certifying engineer will risk his job by refusing work, whatever the weather conditions	It is deemed to be the responsibility of all certifying staff to appreciate the environmental limitations under which they are working. No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.25 (c) (6)	Aircraft Electronics Assoc. (AEA)	049	Recommended Changes: Delete the second paragraph beginning with "Therefore where the working environment..." Add the following: "Management procedures for performing line maintenance when the environment deteriorates to unacceptable conditions to include the use of personal equipment, portable shelters, etc, must be included in the exposition."	The Association concurs that maintenance and inspections tasks should be carried out without undue distractions. However, general aviation businesses have no control over the weather and therefore must develop procedures for working in ALL environments. The limitation on working in "unacceptable" environments is overly restrictive for general aviation and through the use of personal equipment the affects of the environment can be safely managed. The AMO should establish procedures for working in extreme environmental conditions.	It is deemed to be the responsibility of all certifying staff to appreciate the environmental limitations under which they are working. No text changed.
145.A.25 (c) (6)	European Regional Airlines Assoc. (ERA)	079	This paragraph is attempting to set parameters for working in a line maintenance environment.	Whilst accepting that there are some conditions which would preclude working on aircraft, it is felt that this paragraph is impractical. Our industry serves customers and airports the world over in some of the most inhospitable climates. How does the Agency intend to influence the environmental conditions at such locations or, if this is not possible, what parameters would the Agency set to clarify the terms "undue distraction" and "satisfactory conditions"?	Subjective elements from the text removed, however it is deemed the responsibility of the certifying staff to appreciate the environmental limitations under which they are working.
145.A.25 (c) (6)	GAMTA	151	Delete the second paragraph beginning with "Therefore where the working environment..." Add the following: "Management procedures for performing line maintenance when the environment deteriorates to unacceptable conditions to include the use of personal equipment, portable shelters, etc, must be included in the exposition."	The Association concurs that maintenance and inspections tasks should be carried out without undue distractions. However, general aviation businesses have no control over the weather and therefore must develop procedures for working in ALL environments. The limitation on working in "unacceptable" environments is overly restrictive for general aviation and through the use of personal equipment the affects of the environment can be safely managed. The AMO should establish procedures for working in extreme environmental conditions.	It is deemed to be the responsibility of all certifying staff to appreciate the environmental limitations under which they are working. No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.25 (d)	ENAC, Italy	102	<p>“...condition of storage are in accordance with the manufacturer instructions to prevent deterioration and damage” can really be complied with also by medium and small organisations (that are not required to hold copies of the component manuals and Service bulletins for every possible part that could be in storage to be installed on a product) only if manufacturers have a requirement in Part 21 to provide such instructions together with the parts.</p> <p>In addition in case of components maintained by other part 145 organisations such instructions shall be referenced in Form One block 13.</p>		No proposal made. No change. The Block 13 on the form 1 is not intended for detailing storage conditions. No text changed.
145.A.30(j)(5)	European Regional Airlines Assoc. (ERA)	079	This paragraph would require the operator to make exhaustive checks to ascertain if any other organisation appropriately approved existed at the location at which the aircraft was grounded.	How does the Agency propose that this is complied with? Furthermore, if there is an appropriately approved organisation in the area but, for whatever reason, commercial person qualified in accordance with this paragraph to be issued a one-off authorisation?	This rule facilitates the operator when grounded away from base and is an exemption from the general rule. It will be the operator's responsibility to ascertain if another organisation is available. No action.
145.A.30	GAMTA	151	Recommended change: Renumber paragraph (c) as paragraph (b) (5).	Paragraph (c). The person identified in paragraph (c) is from the group of persons identified in Paragraph (b). The structure of these paragraphs is confusing and renumbering them will aid in understanding the hierarchy of the organization.	The paragraph c talks about the quality manager and was existing JAR 145.30(c) text and it was therefore deemed inappropriate to include in paragraph b. No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30	DGAC, France	162	In 145.A.30, add a new paragraph (k) as follows:  “An organisation which is in compliance with the PART145 except for 145.A.30 (g), (h)(1) &(2), (i) could be approved PART145 as “ Limited Aircraft or Component Maintenance Organisation” with limited privileges.”	Impracticable: The JAR145 regulation is adapted for the complete aircraft maintenance organisations, engine maintenance organisations and the component maintenance organisations. By the appendix 6 of the JAR145, approved maintenance organisation may use some sub-contractors not JAR145 approved for partial maintenance activities. In this case, the maintenance should have the technical expertise to evaluate the sub-contractor and should control it under the quality system of the JAR145 maintenance organisation. Some maintenance organisations are in position to provide partial aircraft or component maintenance activities but cannot be fully in compliance with the PART145 (painting, structure repair, cabin modification, aircraft weighting, radio testing...). These maintenance organisations can have some facilities, management structure, specialists, tools, data in permanent manner and can implement a Quality system with all maintenance / quality procedures associated but are generally not able to comply with the	An organisation cannot be approved without the appropriate certifying staff. Appropriate certifying staff is already included in the existing JAR 145 requirement and has been transferred into Part 145. No text changed.
145.A.30 (h) (4)	Aircraft Electronics Assoc. (AEA)	058	Recommended Change: Explain what maintenance or inspection paragraph (4) was intended to delegate to aircrew.	It is unclear what paragraph (h)(4) applies to. What would the organization issue a limited certification to the aircraft commander for?	This is the current JAA TGL 38 which has been incorporated into the rule and AMC. No text changed.
145.A.30 (a)	LBA	053	The definition of the "accountable manager" should be harmonised with Part M(.....The definition should be done in a equivalent manner.	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).	No text changed.
145.A.30 (a)	CAA, UK	123	Add '(a)(4) The person nominated shall be identified and their credentials submitted in a form & manner established by the competent authority'. This allows the Accountable Managers background to be assessed for his acceptance by the competent authority.		Not in existing JAR 145 rule-even if the accountable manager's background is checked it can not be used as grounds for not accepting the individual. No text changed.
145.A.30 (a)	CAA, UK	123	In JAR 145, the Accountable Manager was accepted by the authority. In Part 145, this facility has been removed. It is an important factor that the accountable manager is accepted by the competent authority as they are responsible for the organisation approval.		Section B allows acceptance of all 145.A.30(a) and (b) personnel. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (b)	Aerospace Industries Association (AIA)	84	The removal of the requirement, here and other places, that “a senior person and/or manager” staff certain functions is a good change as it bases the requisite selection on qualifications rather than hierarchy.		Noted. No text changed.
145.A.30 (b)	Aerospace Industries Association	170	The removal of the requirement, here and other places, that “a senior person and/or manager” staff certain functions is a good change as it bases the requisite selection on qualifications rather than hierarchy.		Noted. No text changed.
145.A.30 (b) (3)	JAA Harry Jones (JAA Maint. Div)	18	Amended text: <i>The person or persons nominated shall have [ ] knowledge and satisfactory experience related to aircraft and/or component maintenance relevant to the approval and demonstrate a working knowledge of this Part.</i>	The amended text highlights the need for the person(s) to have knowledge and experience relevant to the approval sought, plus knowledge of Part 145.	One change made. Section amended to read Part.
145.A.30 (b) (4)	European Regional Airlines Assoc. (ERA)	079	I believe the word “person” in the first line should be replaced with “person(s)”	in order to maintain consistency with the last line of this paragraph.	Text changed.
145.A.30 (c)	Maintenance Division JAA	12	Delete the “(s)” after the word “person”.	There is only one quality manager.	Text changed.
145.A.30 (c)	European Regional Airlines Assoc. (ERA)	079	I believe the word “person” in the first line should be replaced with “person(s)”	in order to maintain consistency with the third line of this paragraph	Text changed.
145.A.30 (e)	Nayak Air Services Netherlands	88	This paragraph is not clear and shall lead to discussion. Revision and clarification of the explanation of the terms “Human Factors” and “Human Performance” and how to train staff and asses their competence, is necessary.		The Human factors definitions originate from the original definitions in JAR 145. AMC and guidance material clarifies the training and assessment of staff regarding human factors. No text changed.
145.A.30 (e)	KLM Engineering & Maintenance	20	Human Factors Awareness. The activities in relation to making the complete ECAR 145 organisation “Human Factor Aware” is an effort that cannot be done overnight. It is a sort of cultural revolution, with the accompanying timescales . In literature, cultural revolutions in a company take 6 to 8 years to complete. Amendment 5 of JAR 145, JAR 145 organisations would have to comply with JAR 145.30 (e) from July 2005, which was an already quite controversial moment in time. However, with the current ECAR 145 transition schedule mentioned above, ECAR 145A30(e) would have to be in-	This is definitely not acceptable. We believe the least thing the regulator can do is add ECAR 145A30(e) to Article 7. And as already said, even then it is a very aggressive timescale.	Article 7 to the Commission Regulation on continuing airworthiness has been amended to include paragraph 145.A.30(e) thus maintaining the transition provided for in the original JAR 145 text.



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			place in September 2004 !!! because the item is not mentioned in Article 7 of the Regulation .		
145.A.30 (e)	CAA, UK	123	'Management' requirement for competence assessment has been omitted. This was a JAR145 amendment 5 addition (JAR 145.30(e))as it is important that management are not only competent but aware of human factors.		Text changed.
145.A.30 (e)	DGAC, France	162	Add at the end: The qualification of all personnel involved in maintenance shall be recorded. Maintenance personnel shall not be authorised to work unsupervised before they have been properly evaluated."	Implementation problem It is essential to record personnel qualifications. Recording is already required for light aircraft maintenance organisations in M.A.606(e). Inexperienced personnel (newly hired mechanics, on-the-job training personnel,...) should not be allowed to work without supervision before complete evaluation. This point could be a safety issue.	Subject matter covered in AMC. No change from JAR 145.
145.A.35 (e) (f) (j)	LBA	053	In these subparagraphs the "new" support staff B1 and B2 should be added, because this personnel has to meet the requirements or should be given access to their personal records.		Text changed for paragraph 145.A.30(e).
145.A.30 (f)	Dassault Falcon Service France	13	in accordance with <del>officially recognised</del> <b>European or equivalent</b> standards	The word "officially" is ambiguous.	In the absence of an EC standard covering these aspects there has to be flexibility to facilitate national systems in existence. The EU terminology for this is "officially recognised standard". No text changed.
145.A.30 (f)	Maintenance Division JAA	12	On 3 <sup>rd</sup> line (..) structures and/or components are appropriately qualified. "is" should be replaced with "are".		Text changed.
145.A.30 (f)	Finnair	72	The reference to EN 4179 has been removed. Will it be part of the associated AMC or guidance material		Detailed in AMC. No text changed.
145.A.30 (f)	LBA	053	Who will be responsible for the standard? In one sentence the "Agency" is responsible and in the next sentence it is written that it should be an "officially recognised Standard".		In the absence of an EC standard covering these aspects there has to be flexibility to facilitate national systems in existence. The EU terminology for this is "officially recognised standard". No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (f)	ENAC, Italy	102	The requirement in 145.A30(f) about NDT Personnel to be qualified i.a.w. the standard recognized by the agency (not yet defined) needs an adequate transition period to train and qualify such personnel. A similar requirement in JAR145.30 Amdt 3 was supposed to become mandatory only after 31 December 2003, i.e. nearly three years after the publication, and made reference to EN4179.		The standard is defined in the AMC (EN4179) and regarding transition there is a requirement in Part-145 which is only slightly more restrictive than that in the JAR 145 text. No text changed.
145.A.30 (g)	Dassault Falcon Service France	13	any organisation .... shall in case of aircraft line maintenance <b>or in case of aircraft grounded away from the base facility</b> , have appropriate ...	The B1 or B2 certifying staff may release to service an aircraft grounded away from the base after repair under their supervision	Line maintenance includes all defect rectification including that of being grounded away from base. Included in AMC definition 145.A.10. No text changed.
145.A.30 (g)	Mike Newman	40	Second Paragraph. Delete last sentence, which starts with "However" and ends with "simple defect rectification" in its entirety.	A B1 certifier should always be present at daily and pre-departure inspections. He/she has the experience that an 'A' certifier may lack, in as much as the requirement to seek out "hidden damage", as the Americans describe it. A pulled rivet/s, a slight dent or buckle in the skin may not mean a lot to the uninitiated but it may hide further internal damage not aware to exterior eye ball inspection. A senior certifier would look further, or would be expected to do so.	Existing JAR 145 requirement. No text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (g)	DGAC, France	162	<p>Add "(as defined in appendix V)" at the end of the 2nd paragraph, after " [...]" during minor scheduled line maintenance [...]".</p> <p>Add a new appendix V: "Appendix V to Part 145</p> <p>Minor scheduled line maintenance</p> <p>1. Minor scheduled line maintenance which can be certified by Category A certifying staff is any minor scheduled inspection/check up to and including a weekly check specified in the approved aircraft maintenance aircraft programme or the most significant check equivalent to the weekly check.. It includes :</p> <ul style="list-style-type: none"> <li>a) Replacement of wheel assemblies</li> <li>b) Replacement of wheel brake units</li> <li>c) Replacement of emergency equipment</li> <li>d) Replacement of oven, boilers and beverage makers</li> <li>e) Replacement of internal and external lights, filaments and flash tubes</li> <li>f) Replacement of windscreen wiper blades</li> <li>g) Replacement of passenger losing of cowlings and refitment of quick access inspection panels</li> <li>h) Replacement of toilets system components but excluding gates valves</li> <li>i) Simple repairs and replacement of internal compartment doors and</li> </ul>	<p>Part 145.A.30(g) authorises the use of category A task trained certifying staff to carry out minor schedule line maintenance and simple defect rectification. This generic task description needs to be more accurate and shall explicit the depth of maintenance they can assume (see parallel definition of complex maintenance in Part M).</p> <p>This proposition is a little restrictive in order to prevent release to service deviations in regards to the scope of activities of those personnel, which is still not correctly handled by the maintenance organisations.</p>	<p>This information is already detailed in the AMC, and remains at the same level as the JAR 145 text.</p> <p>No text changed.</p>
145.A.30 (h)	Loganair Glasgow	96	<p>Aircraft can operate on the dividing weight clasification @ 5700kg. The DHC-6 Twin Otter aircraft is operated at 5700kg and can fall into two classifications - (ie 5700kg and below / 5700kg and above) classification dividing line needs to be 5700kg and above / 5699kg and below.</p>		<p>Reference changed to include definition of "large aircraft" which meets the intent of the comment.</p> <p>Text changed.</p>
145.A.30 (h)	CAA, UK	123	<p>Part 66 has been changed from JAR 66 and as a result, there is an inconsistency between Part 145 and Part 66 as Part 145 requires a Cat C certifier for aircraft of 5700kgs and above and helicopters of 3175kg and above whereas 66 A 20(a)(4) in Part 66 requires it for aircraft above 5700kgs and helicopters above 3175kgs.</p>		<p>Reference changed to include definition of "large aircraft" which meets the intent of the comment.</p> <p>Text changed.</p>

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145.A.30 (h) (1)	Dassault Falcon Service France	13	In addition sufficient aircraft type rated staff qualified as category B1 and B2 in accordance with ... <b>and specialised personnel</b> shall support the category C certifying staff : (i) B1 and B2 support staff and specialised personnel shall ensure	The B1 and B2 staff are aircraft generalists which are not component specialists and may not be the appropriate personnel for painting, riveting, trouble shooting, programming, calibrating etc. It is necessary to rely upon specialists.	This issue does not exist in JAR 145, only B1 or B2 licensed staff shall carry out this function-this subject was previously discussed in JAA MST where it was agreed to maintain this system. No text changed.
145.A.30 (h) (1)	Maintenance Division JAA	12	In addition the organisation shall have sufficient .....Part 66 and 145 A 35 [ ] to support the category C certifying staff.		Text changed.
145.A.30 (h) (1)	DGAC, France	162	"[...] in the case of base maintenance of aa maximu "[...] in the case of base maintenance of aeroplanes with a maximum take-off mass of 5700kg or above and helicopters with a maximum take-off mass of 3175kg and above, have appropriate aircraft type rated certifying staff qualified as category C in accordance with Part 66 and 145.A.35. In addition sufficient aircraft type rated staff qualified as category B1 and B2 in accordance with Part 66 and 145.A.35 or ,in the case of heavy base maintenance with important volume of structure activity, experienced structure specialists, shall support the category C certifying staff"	<u>Impracticable</u> In certain cases, during heavy base maintenance including many structure activities, Category B1 staff, being a generalist, does not have sufficient experience or knowledge about complex structural work to efficiently support the category C certifying staff. In such case, experienced structural specialists with a good knowledge of the aircraft are more likely to support the category C certifying staff and give all pertinent information before releasing the aircraft owing to a specialised technical opinion about the structural work performed. This has been the case for years in large maintenance organisations.	This issue does not exist in JAR 145, only B1 or B2 licensed staff shall carry out this function-this subject was previously discussed in JAA MST where it was agreed to maintain this system. No text changed.
145.A.30 (h) (1) (ii)	Mike Newman	40	The organisation shall maintain a register of such B1 and B2 support staff who are employed as contracted personnel.		Already covered by the requirement for B1 or B2 support staff.
145.A.30 (h) (1) (iii)	Rolls Royce, Germany	65	The category C certifying staff should perform here a taste of the continuing airworthiness management organization (Ref Part M, Subpart G).		Category C certifying staff requirements are detailed in this Part and do not include continuing airworthiness management topics, however text clarified to highlight category C/B1/B2 interface. Text changed.
145.A.30 (h) (1-2)	CAA, UK	123	The definition of a large helicopter in these paragraphs differs from that defined in Article 2(e) of the associated Regulation, as yet un-numbered. Although 145.A30(h) does not directly refer to "large helicopters" this definition is inferred. 145.A30(h) quotes 3175Kg and above and Article 2(e) quotes large aircraft as being 'a multi-engined helicopter.'		Definitions harmonised. Text changed.

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145.A.30 (h) (1-2)	Air France	86	“[...] in the case of base maintenance of aeroplanes with a maximum take-off mass of 5700kg or above and helicopters with a maximum take-off mass of 3175kg and above, have appropriate aircraft type rated certifying staff qualified as category C in accordance with Part 66 and 145.A.35. In addition sufficient aircraft type rated staff qualified as category B1 and B2 in accordance with Part 66 and 145.A.35 or ,in the case of heavy base maintenance with important volume activity, experienced structure specialists, may support the category C certifying staff”.	The possibility to have category C certifying staff supported by structure or cabin experts should be considered to allow for flexibility staff management relevant to base maintenance activities.	The rule does not prevent one from having experts to assist the category C as deemed fit by the organisation, however the requirement is only for B1 and B2 support staff to "support" the category C. This is clarified in the AMC.
145.A.30 (h) (1-2)	ENAC, Italy	102	The present text is unclear about the role of a Class C Certifying Staff in the release to service of aircraft with a MCTOM below 5700 kg (aeroplanes) or 3175 kg (helicopters). In particular 145.A.30(h)(1) and (2) do not allow Class C CS to release to service small aircraft or helicopters, and this limitation has no rationale. Moreover, for organisation approved for both classes of aircraft (it is the case of almost all helicopters maintenance stations) this would lead to a different procedure of release to service for different classes of aircraft.		Text clarified to distinguish when category C is required. Text changed.
145.A.30 (h) (2)	Aircraft Electronics Assoc. (AEA)	049	Recommended Change: In the middle of the sentence insert "or contracted certifying staff" so that the sentence reads: "...have appropriate aircraft type rated certifying staff, or contracted certifying staff, qualified as category B1 and B2 ...."	Paragraph (h)(2) fails to account for the differences in organizations between large maintenance organizations and small general aviation style organizations. Many small businesses utilize contracted staff for certification purposes. The provision of paragraph (h)(2) must include provisions to contract, as necessary, appropriate B1 and B2 staff.	Contracted staff is considered part of the 145 structure and therefore do not have a specific and different requirement in the Part-145 environment. No text changed.
145.A.30 (h) (2)	GAMTA	151	Recommended Change: In the middle of the sentence insert "or contracted certifying staff" so that the sentence reads: "...have appropriate aircraft type rated certifying staff, or contracted certifying staff, qualified as category B1 and B2 ...."	Paragraph (h) (2). Paragraph (h)(2) fails to account for the differences in organizations between large maintenance organizations and small general aviation style organizations. Many small businesses utilize contracted staff for certification purposes. The provision of paragraph (h)(2) must include provisions to contract, as necessary, appropriate B1 and B2 staff.	As in JAR 145 contracted staff do not have a specific and different requirement in the Part-145 environment. No text changed.
145.A.30 (h) (4)	GAMTA	151	Recommended Change: Explain what maintenance or inspection paragraph (4) was intended to delegate to aircrew.	Paragraph (h) (4). It is unclear what paragraph (h)(4) applies to. What would the organization issue a limited certification to the aircraft	This is the current JAA TGL 38 which has been incorporated into the rule and AMC. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				commander for?	
145.A.30 (j) (5)	GAMTA	151	Recommended Change: Add paragraph (iii) to read: “for aeroplanes with a maximum takeoff mass below 5,700 kg and helicopters with a maximum takeoff mass below 3175 kg, any person holding a qualification on aircraft of similar technology, construction and system	Paragraph (h) (5) (ii). Paragraph (h)(5)(ii) is overly restrictive to private aircraft below 5,700 kg. The majority of small aircraft operate from small airfields and are maintained by maintenance organization or individuals that are certified by local NAAs. Many of the technicians currently maintaining light aircraft are not certificated to ICAO standards. EASA Part 66 does not become effective for light aircraft for another two years. Therefore the provisions of paragraph (h)(5)(ii) would prohibit any person from being contracted to repair a light aircraft until 2010. The qualification of certifying staff for the issuance of one-off authorizations for light aircraft should be the same whether the contracted person is an employee or not.	Existing JAR 145 text. No text changed.
145.A.30 (j) (5) (ii)	Aircraft Electronics Assoc. (AEA)	058	Recommended Change: Add paragraph (iii) to read: “for aeroplanes with a maximum takeoff mass below 5,700 kg and helicopters with a maximum takeoff mass below 3175 kg, any person holding a qualification on aircraft of similar technology, construction and systems.”	Paragraph (h)(5)(ii) is overly restrictive to private aircraft below 5,700 kg. The majority of small aircraft operate from small airfields and are maintained by maintenance organization or individuals that are certified by local NAAs. Many of the technicians currently maintaining light aircraft are not certificated to ICAO standards. EASA Part 66 does not become effective for light aircraft for another two years. Therefore the provisions of paragraph (h)(5)(ii) would prohibit any person from being contracted to repair a light aircraft until 2010. The qualification of certifying staff for the issuance of one-off authorizations for light aircraft should be the same whether the contracted person is an employee or not.	Existing JAR 145 text. No text changed.
145.A.30 (h) 1	Royal Aeronautical Society	107	This para makes reference to “helicopters of a take off mass of above 3175kg” as in Part 66 and we would suggest the same redrafting of text – “multi-engined helicopters or those with a take off mass of above 3175kg”.		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (i)	FOCA Switzerland	29	Reference is not clearly enough specified and should read: "Component certifying staff shall comply with Part 66 <u>Subpart C</u> ".		Reference is deemed to be adequate, if this is more specific and Part-66 changes in the future this would warrant an amendment to Part-145 on the basis of a reference alone. Due to the lengthy time period envisaged to amend the rules in the future this was deemed to be inappropriate. No text changed.
145.A.30 (i)	Zodiac Group, France	33	<b>For line maintenance</b> , component certifying staff shall comply with Part 66	Part 66 is not applicable for the component base maintenance organisations	Line maintenance for components does not exist. No text changed.
145.A.30 (i)	DLH Germany	21	Component certifying staff shall comply with part-66 This requirement is completely new. It is understood that transeuropean standardization requires a standard for component certifying staff to be fulfilled. But for this requirement neither an economic impact assessment as requested by the industry (according to JAR-11) nor a formal NPA process has ever been performed. The corresponding Part-66 does not give any guidance how to qualify and authorize this personnel. This does not reflect the status of the European discussion which was laid down in Draft JAR-66-3. So this proposal bares the risk that – at a later stage – the idea to request licenses for component certifying staff according to Part-66 pops up again. This would be a major economical impact for the aviation industry.		Regarding components the reference in Part- 66 still refers to the National rules, so effectively no change from existing JAR 145 text. No text changed.
145.A.30 (i)	Air France	86	Unacceptable The component certifying staff complying with Part 66 is not considered to enter into force in a JAR.145 change 3 the corresponding Part-66 does not give any guidance how to qualify and authorize this personnel.	Licensing of component staff is understood not to be a requirement according to JAR 145 change 3 and JAR 66.	Regarding components the reference in Part- 66 still refers to the National rules, so effectively no change from existing JAR 145 text. No text changed.
145.A.30 (i)	British Airways CitiExpress Ltd, UK	156	1, Protected rights should be given to present component certifying staff. 2, Details required for licence/qualification requirements.		Regarding components the reference in Part- 66 still refers to the National rules, so effectively no change from existing JAR 145 text. No text changed.
145.A.30 (i) (j) (5) (ii)	European Regional Airlines Assoc. (ERA)	79	This paragraph makes reference to component certifying staff. It was my understanding from an earlier MST meeting that this requirement had been dropped.	Can the Agency please explain why the topic appears within this Part 145?	Regarding components the reference in Part- 66 still refers to the National rules, so effectively no change from existing 145 text. No text changed.
145.A.30 (j)	CAA, UK	123	This note is applicable to (j) (5) only but it implies it is for all of para (j).		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (j)	KLM Engineering & Maintenance	20	<p>Under JAA regime, TGL 43 of JAA AGM section 2 provides the exemption for JAA territory-based JAR-145 approved organisations, to locally employ (non-JAR 66) personnel, in the case of having line maintenance facilities in non-JAA countries.</p> <p>In the final draft of 08/01/03 the intent of TGL43 was covered by ECAR 145.30(j)(2):                      “For line maintenance carried out at a non Member State based line station of an approved ECAR-145 maintenance organisation the certifying staff may be qualified in accordance with the national aviation regulations of the State in which the line station is based, subject to the conditions as specified in appendix 4”</p> <p>The text of the comment version of Part-145, however, does not cover this case (see 145A30(j)):                      “(1) For facilities located outside the Community territory certifying staff may be qualified in accordance with the national aviation regulations of the State in which the organisation is registered subject to the conditions specified in Appendix 4 to this Part.”                      “(2) For lin</p>		<p>Paragraphs 145.A.30(j)(1) and (2) cover both the situations detailed.                      No text changed.</p>
145.A.30 (j)	CAA, UK	123	Notification to the competent authority for one-off authorisations is not considered rule material		<p>Existing JAR 145 requirement.                      No text changed.</p>
145.A.30 (j) (1)	Maintenance Division JAA	12	Should be “organisations” not facilities		Text amended.
145.A.30 (j) (3-4)	Martinair Maintenance & Engineering	61	<p>Crew License for limited maintenance actions                      TGL 38 states a validity of 1 year and a training 1x per year                      Why does this period differ form the period for continuation training, which is 2 years, this would make it possible to incorporate the continuation training of limited line maintenance authorised crew into continuation training for other ECAR Part 145 personnel. Please amend text accordingly.</p>		<p>This requirement is an exemption to permit Flight crew to certify without having a 66 License. The training is therefore more stringent for this category of person as detailed in the prior JAA TGL 38 which is the basis of this requirement.                      No text changed.</p>
145.A.30 (j) (3-4)	Martinair Maintenance & Engineering	61	We propose to add the possibility to ECAR 145.A.30(j)(5) for issuing a One Off authorisation to to ECAR 145 Certifying staff holding a ECAR 66 license on aircraft of similar technology, construction and systems.	Previously we together with CAA-NL proposed to amend the text of Leaflet 42 to cover this.	<p>This is covered by 145.A.30(j)(5)(i).                      No text changed.</p>
145.A.30 (j) (3-4)	Martinair Maintenance &	61	Also text on reporting the One Off authorisation should be part of ECAR 145.A.30(j)(5) since it is not applicable to the	For this purpose we also appended the proposed text for Leaflet 42 to this comment form	Text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
	Engineering		rest of ECAR 145.A.30(j).		
145.A.30 (j) (3-4)	Martinair Maintenance & Engineering	61	(5) In the following unforeseen cases, where an aircraft is grounded at a location other than the main base where no appropriate certifying staff are available, the 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 ECAR 145 B1 or B2 certifying staff holding a ECAR 66 license on aircraft of similar technology, construction and systems; or (iii) 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 (iv) All such cases shall be reported to the competent authority within seven days of the issuance of such	This because ECAR 66 and ECAR 145 provides enough assurance to let an Aircraft Maintenance Technician handle the one off case. This also because by judging the technical knowledge of the AMT we do not see any difference in technical knowledge between an own AMT and an other AMT not holding a type license but holding a license of an aircraft type of a similar technology, construction and systems.	The addition of new paragraph 5(ii) is not necessary, already covered by 5(i). No text changed.
145.A.30 (j) (5)	JAA Harry Jones (JAA Maint. Div)	18	At the end of the last line of the last paragraph add: <b>“by an appropriately approved organisation”</b>	The addition of this text makes it clear that the work must be rechecked by an appropriately approved organisation, not just anyone.	Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.30 (j) (5)	Maintenance Division JAA	12	Final line should read: "all such 145.A.30 (j) (5) cases (..)		Text changed.
145.A.30 (j) (5)	Air France	86	<b>to any person</b> employees holding type qualifications on aircraft of similar technology, construction and systems	It is considered that the personnel employed by the maintenance organization but not integrated in this maintenance organisation can be eligible for article (5).	An employee of the organisation is a known entity who is familiar with the company procedures and therefore is eligible for this category of exemption. It is not deemed to be appropriate to extend this privilege. No text change.
145.A.30 (j) (5)	Transavia, NL	143	Add the following paragraph to article 145A30 (J) (5): (x) to any person holding a JAR 66 B1 or B2 licence on aircraft of similar technology, construction and system. The contracted organisation must obtain and hold on file evidence of the experience and the licence of the person.		The addition of new paragraph 5(ii) is not necessary, already covered by 5(i). No text changed.
145.A.30 (j) (5) (i)	ENAC, Italy	102	Delete the subparagraph	The practical implementation of this rule may lead to unforeseen consequences. Alleviations introduced in 145.A.30 (j)(5)(ii) may cover all the problems.	Transferred text from TGL42. No text changed.
145.A.30 (j) (5) (i)	CAA, UK	123	Amend to read 'to one of its employees holding equivalent type authorisations on aircraft of a similar technology, construction and systems; or'	This will ensure that the person must have an authorisation of similar scope, i.e B1 or B2, to the task.	Text changed
145.A.30 (j) (5) (i)	CAA, Norway	131	A detailed step by step work sheet should be defined by the organisation, communicated to the one-off authorisation holder and signed off by the one-off authorisation holder when completing the work steps.	All details of any work completed and certified must be recorded in the Aircraft Technical Log. Staff remotely located cannot determine the full extent of the work required only detail what	AMC clarifies procedure to be followed. No action.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				scope of work may be certified.	
145.A.30 (j) (5) (i)	Monarch Aircraft Engineering Ltd, UK	132	A detailed step by step work sheet should be defined by the organisation, communicated to the one-off authorisation holder and signed off by the one-off authorisation holder when completing the work steps.	All details of any work completed and certified must be recorded in the Aircraft Technical Log. Staff remotely located cannot determine the full extent of the work required only detail what scope of work may be certified.	AMC clarifies procedure to be followed. No action.
145.A.30 (j) (5)(ii)	European Regional Airlines Assoc. (ERA)	079	This paragraph requires that any maintenance performed under the authority of a one-off approval is re-checked.	We fail to see the need for this. If the organisation that issued the one-off approval was in any way unhappy as to the ability of the individual to complete the task in a safe and airworthy manner, they would not have issued the approval.	Existing JAR 145 text. No text changed.
145.A.30 (c)	Aircraft Electronics Assoc. (AEA)	049	Recommended change: Renumber paragraph (c) as paragraph (b) (5).	The person identified in paragraph (c) is from the group of persons identified in Paragraph (b). The structure of these paragraphs is confusing and renumbering them will aid in understanding the hierarchy of the organization.	This is the quality requirement and should not be combined with the requirements of the nominated persons. No text changed.
145.A.35	Dassault Falcon Service France	13	Certifying staff <del>and</del> category B1 and B2 support staff <b>and specialised personnel</b> <b>(a) Specialised personnel means those personnel qualified according to Part 145 A 30 (f)</b>	The B1 and B2 staff are aircraft generalists which are not component specialists and may not be the appropriate personnel for painting, riveting, trouble shooting, programming, calibrating etc. It is necessary to rely upon specialists.	This issue does not exist in JAR 145, only B1 B2 licensed staff shall carry out this function-subject discussed in JAA MST. No text change.
145.A.35	British Airways Maintenance Cardiff	97	Certifying and support staff. This paragraph states that .....B1 & B2 support staff should have an 'adequate' understanding of the relevant aircraft etc etc	'Adequate' is undefined. ATA 104 gives clear direction to the appropriate levels required for support roles.	AMC defines "adequate". No text change.
145.A.35	GAMTA	151	Recommended Change: Remove the reference to paragraph (f).	Paragraph (g). The last sentence of paragraph (g) states "Continued validity of the certificate authorization is dependent upon continued compliance with paragraphs (a), (b), (d), (f) and where applicable, paragraph (c). Paragraph (f) addresses one-off authorizations. What is, or should be, continued compliance with the one-off provisions of Paragraph (f)?"	Text changed.
145.A.35	Lufthansa Technik	25	The organisation shall ensure that all certifying staff .... are involved in at least six months of actual aircraft maintenance during the past two years before the certification authorisation may be extended.actual aircraft	Argument: The requirement to review "experience in any consecutive two year period" may lead to unnecessary burden in some organisations since daily observation of staff	Existing JAR 145 text. No text change.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			maintenance during the past two years before the certification authorisation may be extended.	records may become necessary.	
145.A.35 (a)	DLH Germany	21	“Category B1 and B2 support staff” means those category B1 and B2 staff in the base maintenance environment who do not necessarily need to hold certification privileges	License holders with certification privileges should not be excluded from performing the tasks and functions of supporting staff.	Text changed.
145.A.35 (a)	CAA, UK	123	Amend to read ‘In the case of certifying staff and Category B1 & B2 Support staff, this must be accomplished before the issue or re-issue of the authorisation.’	This requirement to establish the level of understanding of the aircraft/component and procedures should apply equally to Category B1 & B2 Support Staff.	This only applies to certifying staff. No text changed.
145.A.35 (a)	BDLI	148	“Category B1 and B2 support staff” means those category B1 and B2 staff in the base maintenance environment who do not necessarily need to hold certification privileges.	License holders with certification privileges should not be excluded from performing the tasks and functions of supporting staff.	Text changed.
145.A.35 (a)	DGAC, France	162	In 145.A.35(a) add: “For “Limited Aircraft or Component Maintenance Organisation”, certifying staff should have the adequate basic knowledge, experience and training on the aircraft/component to be maintained and training on the maintenance organisation procedures.”	Refer to 145.A.30 reason.	Subject matter covered in AMC. No change from JAR 145.
145.A.35 (a)	Lufthansa Technik	25	“Category B1 and B2 support staff” means those category B1 and B2 staff in the base maintenance environment who do not necessarily need to hold certification privileges.	Argument: License holders with certification privileges should not be excluded from performing the tasks and functions of supporting staff.	Text changed.
145.A.35 (b)	CAA, UK	123	This rule does not allow an overseas Part 145 organisation to issue a certification authorisation to its certifying staff. In addition, it does not allow a Part 145 organisation to issue limited certification authorisations to flight crew as allowed in Part 145.30(j)(30 & (4).		Text changed.
145.A.35 (b)	DGAC, France	162	In 145.A.35(b), add: “This requirement is not applicable for the “Limited Aircraft or Component Maintenance Organisation”, After the high training standards of the J-66 syllabus and the competence check in a 145 organisation, a 18 year old Cat A mechanic is well capable of carrying out and signing for the tasks he was trained on	Refer to 145.A.30 reason.	Please refer to 145.A.30. No text changed.
-	DLH Germany	21	The organisation shall ensure that all certifying staff .... are involved in at least six months of actual aircraft maintenance during the past two years before the	The requirement to review “ experience in any consecutive two year period” may lead to unnecessary burden in some organisations since	Existing JAR 145 requirement. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<u>certification authorisation may be extended.</u>	daily observation of staff records may become necessary.	
145.A.35 (c)	ENAC, Italy	102	The organisation shall ensure that all certifying staff and category B1 and B2 support staff are involved in at least six months of actual <del>aircraft</del> <u>relevant aircraft or component</u> maintenance experience in any consecutive two year period. For the purpose of this paragraph “involved in actual aircraft <u>or component</u> maintenance” means that the person has worked in an aircraft maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried out maintenance on at least some of the aircraft type systems <u>or components</u> specified in the particular certification authorisation.	In 145.A35(c) there is a requirement for actual aircraft maintenance experience in any consecutive two years period. This requirement is applicable also to component certifying staff for which is not reasonable. The word “aircraft” shall be deleted in all paragraph 145.A35(c) and replaced by “relevant aircraft or component” ; moreover last two lines make reference to the certification authorisations but have to be reworded, since the paragraph is applicable also to support staff. The wording used is similar to that used in JAR145.35(b) but that JAR requirement is applicable only to aircraft release personnel.	Text changed.
145.A.35 (c)	CAA, UK	123	Amend to read ‘The organisation will ensure that all aircraft certifying staff..’ <i>Otherwise this invokes the requirement for all engine &amp; component overhaul staff</i>		Paragraph only requires compliance by certifying staff and category B1 and B2 support staff. No text changed.
145.A.35 (c)	BDLI	148	The organisation shall ensure that all certifying staff .... are involved in at least six months of actual aircraft maintenance during the past two years before the certification authorisation may be extended.	The requirement to review “ experience in any consecutive two year period” maylead to unnecessary burden in some organisations since daily observation of staff records may become necessary.	Existing JAR 145 requirement. No text changed.
145.A.35 (e)	DLH Germany	21	....under this part to certifying staff, (and a procedure to ensure compliance with part-66) delete last sentence; intention is unclear.		Existing JAR 145 text. No text change.
145.A.35 (e)	BDLI	148	....under this part to certifying staff, (and a procedure to ensure compliance with part-66) delete last sentence;	Intention is unclear.	Existing JAR 145 text. No text change.
145.A.35 (e)	Lufthansa Technik	25	....under this part to certifying staff, (and a procedure to ensure compliance with part-66) delete last sentence; intention is unclear.delete last sentence;	intention is unclear.	Existing JAR 145 text. No text change.
145.A.35 (f)	Maintenance Division JAA	12	Last sentence should read: “(...) in the exposition <u>for</u> the issue (..)”		Text changed

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.35 (f)	European Regional Airlines Assoc. (ERA)	079	The fourth line of this paragraph appears to have some text missing between the words "exposition" and "the issue". The missing text could be "prior to" or "before"?		Text changed.
145.A.35 (f)	CAA, UK	123	Sentence does not read correctly. Add 'for' between 'exposition' and 'the issue...'		Text changed.
145.A.35 (g)	Air France	86	When the conditions of paragraphs (a), (d), (f) and, where applicable, paragraph (b), and (c) have been fulfilled by the certifying staff, the organisation shall issue a certification authorisation that clearly specifies the scope and limits of such authorisation. Continued validity of the certification authorisation is dependent upon continued compliance with paragraphs (a), (b), (d), (f), and where applicable,	The applicable rule taken into account in paragraph (b) does not concern the component certifying staff. Summary (a),(d), and (f) shall apply to all types of Certifying staff ( aircraft and components) (b), and (c) shall apply only to aircraft Certifying staff .	Component certifying staff are not covered in this paragraph. No text change.
145.A.35 (g)	Aircraft Electronics Assoc. (AEA)	058	Recommended Change: Remove the reference to paragraph (f)	The last sentence of paragraph (g) states "Continued validity of the certificate authorization is dependent upon continued compliance with paragraphs (a), (b), (d), (f) and where applicable, paragraph (c). Paragraph (f) addresses one-off authorizations. What is, or should be, continued compliance with the one-off provisions of Paragraph (f)?"	The continued validity of sub paragraph (f) applies -this paragraph does not address one-off certifications it actually excludes them. No text change.
145.A.35 (h)	Maintenance Division JAA	12	clear to the certifying staff and <b>to</b> any authorised person. Last sentence should read: "(...) to examine (..) not examining" Authorised person means an official of the competent authority, the Agency or the member state.....		Text changed but not as requested.
145.A.35 (h)	European Regional Airlines Assoc. (ERA)	079	I would suggest that the word "examining" on line two of this paragraph be replaced with the words "to examine".		Text changed.
145.A.35 (h)	CAA, UK	123	'The certification authorisation must be in a style that makes its scope clear to the certifying staff and any authorised person who may require <u>to examine</u> <del>examining</del> the authorisation.'		Text changed.
145.A.35 (j)	Maintenance Division JAA	12	(2) All <b>relevant</b> training completed Last line should refer to: authorisation records not personal records		Text changed.
145.A.35 (j)	European Regional Airlines Assoc. (ERA)	079	This paragraph states that certifying staff shall be given access to their "personal records". Can the Agency clarify what is meant by this term?		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.35 (j) (3)	CAA, UK	123	Amend to read 'the scope of the authorisations issued, where relevant.'	(Removes the word 'certification' to cover B1 / B2 support staff)	Text changed.
145.A.35 (l)	European Regional Airlines Assoc. (ERA)	079	We feel that this should be a minimum of 96 hours to cater for staff that may be working on a 4x4 shift	It is felt that the 24 hour time limit that is specified in this scope to extend this transition period? restrictive.	Existing JAR 145 requirement from AMC. No action.
145.A.35 (l)	British Airways CitiExpress Ltd, UK	156	1, 24 hours is a too shorter timescale. Suggest at least 72 hours for travel time, etc.		Existing JAR 145 requirement from AMC. No action.
145.A.35 (m)	European Regional Airlines Assoc. (ERA)	079	Can the Agency explain why an engineer cannot certify at the age of 18?		Existing requirement transferred from JAR 66. No text changed.
145.A.35 (m)	Martinair Maintenance & Engineering	61	Minimum age to apply for AML 18 years, but they become 145 certifying staff at 21 years. It is not clear if this also applies for ECAR 66 Cat A Certifying Staff We propose to make it possible to become Cat A certifying staff before 21 years.		This is an existing requirement transferred from JAR 66 and is applicable to all Part- 145 certifying staff. No text changed.
145.A.35 (m)	LBA	053	This subparagraph should be transferred to Part 66.	It is relevant for certifying staff in Part M and Part 145. In Part M there is no age required. In Part 66 the minimum age is 18 years for the applicant which is the ICAO Annex I requirement.	This is a specific Part- 145 requirement. No action.
145.A.35 (m)	Tyrolean Airways	100	The minimum age (at least for Cat A) licence holders should be reduced to 18 years again. This would correspond to ICAO licence age requirements.		This is an existing requirement transferred from JAR 66 and is applicable to all Part- 145 certifying staff. No text changed.
145.A.40 (a)	Aircraft Electronics Assoc. (AEA)	066	Recommended Change: Insert "when performing maintenance" so that the paragraph reads: "The organization shall have the necessary equipment, tools and materials available when performing maintenance that is included in the approved scope of work."	The Association commends and supports the concept contained throughout this Part and other Parts of the regulations that require equipment, tools and materials must be available at the time maintenance is being performed. However, that language is missing from paragraph (a)	Exemption to permanent availability of tools is dealt with in 145.A.40(a)(2)
145.A.40 (a)	Maintenance Division JAA	12	Suggest slight amendment for strength as follows; The organisation shall have <b>available and use</b> the necessary equipment, tools and material [ ] to perform the approved scope of work. (1) Shall use that tool or equipment unless the use of alternative tooling or equipment is agreed by the competent authority via a procedure specified in the exposition.		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.40 (a)	GAMTA	151	Recommended Change: Insert "when performing maintenance" so that the paragraph reads: "The organization shall have the necessary equipment, tools and materials available when performing maintenance that is included in the approved scope of work."	Paragraph (a). The Association commends and supports the concept contained throughout this Part and other Parts of the regulations that require equipment, tools and materials must be available at the time maintenance is being performed. However, that language is missing from paragraph (a)	Exemption to permanent availability of tools is dealt with in 145.A.40(a)(2)
145.A.40 (a) (1)	Aerospace Industries Association (AIA)	84	Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless procedures are specified in its exposition permitting the use of alternative tooling or equipment <u>equivalent to that specified by the manufacturer.</u>	Equivalent tools are used throughout the industry. The requirements for an acceptable equivalent tool system should be addressed in an AMC or other guidance material.	Text changed but not as detailed.
145.A.40 (a) (1)	Aerospace Industries Association	170	Where the manufacturer specifies a particular tool or equipment, the organisation shall use that tool or equipment, unless procedures are specified in its exposition permitting the use of alternative tooling or equipment equivalent to that specified by the manufacturer.	Equivalent tools are used throughout the industry. The requirements for an acceptable equivalent tool system should be addressed in an AMC or other guidance material.	Text changed but not as detailed.
145.A.40 (a) (2)	Aircraft Electronics Assoc. (AEA)	066	Recommended Change: Amend paragraph (a)(2) to read: "In the case of any tool or equipment that is not permanently available procedures that will ensure the required equipment and/or tools are available when work is being performed shall be detailed in an exposition procedure."	The Association agrees with the flexibility that a maintenance organization does not need to have equipment and tools permanently available. The organization may elect to lease tools for any number of reasons; the language of paragraph (a)(2) is overly restrictive without any increase in safety. The reason an organization elects not to own equipment and tools is irrelevant, the procedures the organization will use to ensure the equipment and tools are available when "work is being performed" is essential.	No justification as the present wording covers this subject. No text changed.
145.A.40 (a) (2)	JAA Harry Jones (JAA Maint. Div)	18	Amend the text to read as follows: .....such cases shall be <b>agreed by the Member State</b> and detailed in an exposition procedure.	Amend the text to read as follows: .....such cases shall be <b>agreed by the Member State</b> and detailed in an exposition procedure.	No justification as the present wording covers this subject. No text changed.
145.A.40 (a) (2)	Zodiac Group, France	33	The equipment, tools, and material must be located on the premises and under the repair station's control when the work is being done."	A permanent availability is not necessary to improve the safety	No justification as the present wording covers this subject. No text changed.
145.A.40 (a) (2)	CAA, UK	123	The last sentence should be replaced with the following wording: 'When equipment and tools are not permanently available, this should be agreed with the competent authority' This was the text used in JAR 145.		No justification as the present wording covers this subject. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.40 (a) (2)	GAMTA	151	Recommended Change: Amend paragraph (a)(2) to read: "In the case of any tool or equipment that is not permanently available procedures that will ensure the required equipment and/or tools are available before maintenance is begun shall be detailed in an exposition procedure."	Paragraph (a) (2). The Association agrees with the flexibility that a maintenance organization does not need to have equipment and tools permanently available. The organization may elect to lease tools for any number of reasons; the language of paragraph (a)(2) is overly restrictive without any increase in safety. The reason an organization elects not to own equipment and tools in irrelevant, the procedures the organization will use to ensure the equipment and tools are available when "work is being performed" is essential.	No justification as the present wording covers this subject. No text changed.
145.A.40 (a) (2)	European Regional Airlines Assoc. (ERA)	079	This paragraph requires that equipment and tools must be "permanently available".	Can the Agency provide a definition for this term? Similarly, can the Agency provide parameters for the term "infrequently used" that appears on line two of this paragraph?	Transferred from previous JAR 145 AMC.
145.A.40 (b)	DLH Germany	21	The organisation shall control and calibrate, or make arrangements with qualified organisations to calibrate tools, equipment and....	many maintenance organisations will be not in the position to calibrate all of their equipment and tools.	Text changed.
145.A.40 (b)	Dassault Falcon Service France	13	to an <del>officially recognised</del> <b>European or equivalent</b> standard	The word "officially" is ambiguous.	In the absence of an EC standard covering these aspects there has to be flexibility to facilitate national systems in existence. The EU terminology for this is "officially recognised standard". No text changed.
145.A.40 (b)	Rolls Royce, Germany	65	... calibrate tools, equipment and particularly test equipment as appropriate, traceable to an officially recognized standard ...		Text changed
145.A.40 (b)	Finnair	72	Th organisation shall control and calibrate tool, equipment and particularly test equipment, as appropriate, to an officially recognised standard.....		Text changed
145.A.40 (b)	Lufthansa Technik	25	The organisation shall control and calibrate, or make arrangements with qualified organisations to calibrate tools, equipment and....	Argument: many maintenance organisations will be not in the position to calibrate all of their equipment and tools.	Text changed.
145.A.40 (b)	LBA	053	It should be expressed that the calibration can be done by a third party, which has an European or national approval for calibration. The standards should be kept by the organisation which is doing the calibration. The control of tools,... shall be done by the AMO.		Text changed
145.A.40(b)	BDLI	148	The organisation shall control and calibrate, or make arrangements with qualified organizations to calibrate tools, equipment and....	Many maintenance organisations will be not in the position to calibrate all of their equipment and tools.	Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.42	ENAC, Italy	119	<p>Overlap between (145.A.42, M.A.501, 21.A.307 ) 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 145.A.42, as follows:</p> <p>(a) The organisation shall ensure that ..... on an EASA Form One or equivalent, except for the following:            (1) Components with .....;            (2) Standard parts used on .....;            (3) Material both raw and consumable .....</p> <p>(b) Prior to installation of a component, .....</p> <p>(c) The organisation may fabricate a restricted .....</p> <p>(d) Components which have reached their .....</p> <p><i>Note: Airworthiness release of new component is regulated by Part 21 and BASA IPAs.</i></p>		This paragraph deals with the acceptance of components. The text has however been amended for paragraph (a).
145.A.42	KLM Engineering & Maintenance	20	This new paragraph 42, evidently is meant to replace TGL's 9, 10 and 11 (and 21?) of JAA AGM section 2. Not all information from these leaflets is covered by this paragraph (e.g. specification of EASA F-1 equivalent, dual/combined forms, serviceable removal etc.). Possibly, the AMC to 145.A.42 gives the lacking information; however the AMC is not available.		AMC gives clarification to the rule. No text changed.
145.A.42 (a)	Dassault Falcon Service France	13	The organisation shall ensure that no component <b><i>is installed on aircraft or component at the time of the release to service</i></b> <del>accepted</del> unless it is in a satisfactory condition and has been appropriately released to service on EASA Form one or equivalent , except...	"Accepted" is ambiguous. We may "accept" parts for test, or parts that are serviceable but not yet certified, or parts coming from subcontractors and waiting for release documents. This does not mean that they will be on the aircraft at the release to service.	Text changed.
145.A.42 (a)	Dassault Falcon Service France	13	add to (a) : (4) Component maintained inside the maintenance organisation for installation in an aircraft released to service by the same maintenance organisation (5) Small parts made by the maintenance organisation for installation on the aircraft or component released to service by the maintenance organisation	Missing cases already accepted by the JAR 145.	Text amended for point number 1, the second point is not accepted as this is dealt with in paragraph (c) and only permits fabrication of parts inside the organisation.
145.A.42 (a)	Rolls Royce, Germany	65	Does this mean, that a component released with a EASA Form One under Part M, Subpart H is eligible for use by a Part 145 organization?		EASA Form 1 or equivalent is defined in the AMC and does not contain a Part M Subpart F release.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.42 (a)	Aerospace Industries Association (AIA)	84	<b>This is a critical issue.</b> Revise as follows: (a) The organisation shall ensure that no component is accepted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form One or equivalent (including a JAA Form One, FAA Form 8130-3 or TCCA Form 24-0078 whether issued before or after the effective date of EASA) except for the following:	This will explicitly grandfather previously acceptable parts with a known status, as remaining acceptable for use under EASA requirements. There are thousands of “good parts” that will be in this category on the day that EASA take effect and an affirmative statement of acceptability will benefit both regulators and the industry.	EASA Form 1 or equivalent is defined in the AMC and does not contain a Part-M Subpart F release.
145.A.42 (a)	LBA	053	The word "equivalent" should be explained in an AMC.		AMC explains "equivalent". No text changed.
145.A.42 (a)	CAA, UK	123	Amend to read ‘The organisation shall ensure that no component is accepted for use...’	An organisation can accept a part without an appropriate release but cannot use / install it without the appropriate release	Text changed but not as requested.
145.A.42 (a)	DGAC, France	162	“The organisation shall ensure that no component is fitted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form One or equivalent accompanied by an authorised release certificate, except for the following [...]” No component, except standard parts, may be fitted unless it is in a satisfactory condition and is accompanied by an authorised release certificate	<b>Implementation problem</b> The satisfactory condition must be checked when fitting the component Harmonisation with M.A.501 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). Acceptance of Forms under bilateral agreements are covered by the bilateral.	This paragraph is not intended to control the fitment of components but their acceptance into the organisations supply chain. Text has however been modified following comments.
145.A.42 (a)	Aerospace Industries Association	170	<b>This is a critical issue.</b> Revise as follows: (a) The organisation shall ensure that no component is accepted unless it is in a satisfactory condition and has been appropriately released to service on an EASA Form One or equivalent (including a JAA Form One, FAA Form 8130-3 or TCCA Form 24-0078 whether issued before or after the effective date of EASA) except for the following:	This will explicitly grandfather previously acceptable parts with a known status, as remaining acceptable for use under EASA requirements. There are thousands of “good parts” that will be in this category on the day that EASA take effect and an affirmative statement of acceptability will benefit both regulators and the industry.	EASA Form 1 or equivalent is defined in the AMC and does not contain a Part-M Subpart F release.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.42 (a) (1)	Eurocopter France	4		<p>We are not have understood the situation :</p> <ul style="list-style-type: none"> <li>· is it a maintenance carried out according to approved maintenance data but not released by a an authorised release certificate;</li> <li>· is it because of uncompleted work for example because of a missing part</li> <li>· is it because of a non conformity</li> </ul> <p>Can the text should be precise or refer to examples.</p>	Text changed.
145.A.42 (a) (1)	Finnair	72	Components with unknown or defective status that <b>will</b> be maintained in accordance with an approved standard prior to being accepted for release to service.	We don't understand the sentence but if this means components that are coming in to be maintained the text should be as proposed.	Text changed.
145.A.42 (a) (1)	ENAC, Italy	102	In 145.A42(a)(1) there is the possibility for Par145 maintenance organisations to accept components without a JAA Form One and with defective or unknown status; this paragraph has to be clarified: it is not clear how this components could "have been mantained" prior of the acceptance since they are still defective and the meaning of "accepted for release to service" . Our understanding is that the intent of the paragraph was probably to allow component maintenance organisations to accept defective components by customers in order to maintain them according to an approved status prior to the relase to service. In this case provision shall be made to avoid a release to service to third parties of "bogus parts" or after incomplete maintenance. For this reason this paragraph has to be clarified and amended to request that when the status of the part is unknow or not completely known and the maintenance performed in accordance to the Work Order is not a complete recertification of the component, including ass		Text clarified.
145.A.42 (a) (1)	CAA, UK	123	Amend A.42(a) (1) to read 'Unserviceable components that have been maintained...' as the current paragraph is unclear & confusing.		Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.42 (b)	Nayak Air Services Netherlands	88	According JAR-145.50(c) this paragraph was meant for (used) aircraft component release certificates prior to JAR-145.3 (a)(3) or (5). For a Line Maintenance Organization it is not possible to check the modification and AD status of aircraft components. Appropriate release document issued by the Aircraft component maintenance organization in combination with a JAR-OPS certified maintenance program should ensure the proper modification and AD status of each particular component. The Line Maintenance Organization should not be made responsible for the inspection of other (ECAR) approved organizations.		Previous JAR 145 requirement. No text changed.
145.A.42 (b)	European Regional Airlines Assoc. (ERA)	079	I believe the letter "s" to be superfluous on the word "modifications" on line two of this paragraph.		Text changed.
145.A.42 (c)	Aerospace Industries Association (AIA)	84	<b>This is a critical issue.</b> Revise as follows: (c) The organisation may fabricate a restricted range of parts to be used in the course of undergoing work within its own facilities provided procedures are identified in the exposition based upon part criticality, data sufficiency, fabrication quality control system, including subcontractors, and regulatory oversight.	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.	AMC defines the scope of fabrication permitted. No text changed.
145.A.42 (c)	LBA	053	Use the full wording "maintenance organisation exposition" to get no confusion with other expositions.	An AMC containing the content of former Leaflet No. 9 should explain the minimum requirements for the procedures.	This Part deals with maintenance organisation approvals, therefore it is not deemed necessary to specify "maintenance organisation exposition". No text changed.
145.A.42 (c)	DGAC, France	162	Propose to delete paragraph	For coherence with M.A.603, fabrication capabilities should be included in 145.A.75 related to privileges.	This is a transposition of the existing JAR 145 TGL 9, and this activity is not permitted in Part-M Subpart F as there is no quality system. No text changed.
145.A.42 (c)	Aerospace Industries Association	170	<b>This is a critical issue.</b> Revise as follows: (c) The organisation may fabricate a restricted range of parts to be used in the course of undergoing work within its own facilities provided procedures are identified in the exposition based upon <u>part criticality, data sufficiency, fabrication quality control system, including subcontractors, and regulatory oversight.</u>	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	AMC defines the scope of fabrication permitted. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				this enhanced definition.	
145.A.42 (d)	FOCA Switzerland	29	"...classified as unsalvageable..." is too vague. The action shall be <u>scratching</u> .		Text changed but not as proposed.
145.A.42 (d)	Aerospace Industries Association (AIA)	84	Add to the end of this subsection: (d) Components which have reached their certified life limit or contain a nonrepairable defect shall be classified as unsalvageable and shall not be permitted to re-enter the component supply system unless such components receive a life limit extension or a repair is developed that remedies such non-repairable defect.	Life limited parts often receive life extensions, especially in the case of new configurations/models and repair development is an on-going discipline. The added text meets the intent of the conditions in Part M, M.A. 504. This phase would allow components to be retained or returned to the operator to be safely held in the event of new developments.	Text changed but not as proposed.
145.A.42 (d)	European Regional Airlines Assoc. (ERA)	079	The term "certified life limit" used in the first line of this paragraph differs from the terminology used consistently elsewhere in the I.R.s. This should be amended to read "service life limit".		Terminology is consistent across maintenance related Implementing Rules. No text changed.
145.A.42(d)	Aerospace Industries Association	170	Add to the end of this subsection: (d) Components which have reached their certified life limit or contain a nonrepairable defect shall be classified as unsalvageable and shall not be permitted to re-enter the component supply system <u>unless such components receive a life limit extension or a repair is developed that remedies such non-repairable defect.</u>	Life limited parts often receive life extensions, especially in the case of new configurations/models and repair development is an on-going discipline. The added text meets the intent of the conditions in Part M, M.A. 504. This phase would allow components to be retained or returned to the operator to be safely held in the event of new developments.	Text changed but not as proposed.
145.A.42(d)	CAA, UK	123	Amend wording to that contained in M.A.504 in IR M for consistency		Text changed.
145.A.45	Flyvedlikehold, Norway	135	The ECAR-145 organization does not need to own the maintenance data as long as they have an agreement with the owner to have them in their facility.		This does not require the organisation to "own" the data merely to "hold such data during the performance of maintenance.... Etc". No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.45	Rolls Royce, Germany	65	Text is inconsistent with Part M, M.A.609.		Text amended to harmonise between 145 and M, however Part-145 is a more stringent requirement than Part-M, therefore there are differences. Text changed.
145.A.45 (a)	Aerospace Industries Association (AIA)	84	(second paragraph): <b>In the case of maintenance data provided by an operator or customer, the organisation shall hold such data when the work is in progress completed, with the exception of the need to comply with 145.A.55(c).</b>	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.	Existing JAR 145 requirement. No text changed.
145.A.45 (a)	Aerospace Industries Association (AIA)	84	This provision allows the Agency to designate as “applicable maintenance data”... “any applicable standard”... “recognized by the agency as a good standard for maintenance”.	This designation is too subjective and indeterminate which will result in on-going changes to applicable data without objective and known standards for those required to comply.	Text changed.
145.A.45 (a)	Aerospace Industries Association	170	(second paragraph): In the case of maintenance data provided by an operator or customer, the organisation shall hold such data when the work is (in progress) completed, with the exception of the need to comply with 145.A.55(c).	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.	Existing JAR 145 requirement. No text changed.
145.A.45 (b)	Maintenance Division JAA	12	(1). <b>Information issued by the Agency or the Member State.</b> Delete “responsible for the oversight of the product.” It is misleading (3). Any applicable AD “issued or adopted by the Agency”		Text changed but not as requested.
145.A.45 (b) (1)	CAA, UK	123	The competent authority as defined in 145.1 conflicts with this statement. AD's etc issued by the competent authority responsible for the oversight of the product.....this was JAA or JAA FMA ...EASA will be issuing AD's, etc, as they will be the Authority responsible for the type certificate. ‘oversight of the product’ is inappropriate wording. Suggest it is worded as Agency or competent authority responsible for the type certificate		Text changed.
145.A.45 (b) (2)	LBA	053	The wording “any other organisation” should be explained in a definition.		Text changed.
145.A.45 (b) (3)	CAA, UK	123	This needs to be more specific. It should be i.e. ‘Any applicable AD issued or adopted by the Agency.’ Otherwise it could mean that a non EU State AD issued on a A320 could be applicable. This would match the wording used in IR21A.3B		Due to the fact that Part-145 can permit maintenance of foreign aircraft it is not possible to limit to Agency adopted ADs only. Text changed but not as requested.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			Renumber A.45 (b) (4) to improve order logic		
145.A.45 (b) (4)	CAA, UK	123	Competent authority of a third country should be where the authority is responsible for the type certificate and not state of registry.		Text changed.
145.A.45 (b) (5)	Aerospace Industries Association	170	This provision allows the Agency to designate as “applicable maintenance data”... “any applicable standard”... “recognized by the agency as a good standard for maintenance”.	This designation is too subjective and indeterminate which will result in on-going changes to applicable data without objective and known standards for those required to comply.	Competence for this activity is clearly an Agency function as defined in the Regulation (EC) No 1592/2002. No text changed.
145.A.45 (d)	Aerospace Industries Association (AIA)	84	<b>This is a critical issue.</b> Revise as follows: (d) The organisation may only modify maintenance instructions in accordance with a procedure specified in the maintenance organisation’s exposition. With respect to those changes, the organisation shall demonstrate that they result in equivalent or improved maintenance standards and shall inform the type-certificate holder of such changes. Maintenance instructions for the purposes of this paragraph means instructions on how to carry out the particular maintenance task: they exclude the engineering design of repairs and modifications.	We question the intended function of such notification and responsibilities that could be imputed to the type-certificate holder from such a notification. The type certificate holder should have no responsibility thrust upon itself to review changed maintenance instructions made by third parties, unless under a voluntary contract between the parties. Lack of a response might be construed, by some, as approval by the type-certificate holder. It would also increase the potential liability upon type-certificate holders, should an unfortunate event occur based on those instructions. We request deletion of this clause.	Existing JAR 145 text. No text changed.
145.A.45 (d)	Aircraft Electronics Assoc. (AEA)	066	Recommended Change: Amend the second sentence to read: “With respect to those changes, the organization shall demonstrate that they result in equivalent or improved maintenance standards and in the case of changes made for the purpose of correcting a safety of flight or airworthiness discrepancy the organization shall inform the type-certificate holder.”	Paragraph (d) allows a maintenance organization to modify maintenance instructions and then mandates that the maintenance organization inform the type-certificate holder of those changes. The Association concurs with notifying the type certificate holder when the modification remedies a safety of flight or airworthiness issue, however, in the case where the maintenance organization has efficiency may contain commercially sensitive or proprietary data that may benefit a competitor to efficiency may contain commercially sensitive or proprietary data that may benefit a competitor to the type certificate holder. The sharing of this data should not be mandated.	Existing JAR 145 text. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.45 (d)	Aerospace Industries Association	170	<b>This is a critical issue.</b> Revise as follows: (d) The organisation may only modify maintenance instructions in accordance with a procedure specified in the maintenance organisation's exposition. With respect to those changes, the organisation shall demonstrate that they result in equivalent or improved maintenance standards and shall inform the type-certificate (holder of such changes). Maintenance instructions for the purposes of this paragraph means instructions on how to carry out the particular maintenance task: they exclude the engineering design of repairs and modifications.	We question the intended function of such notification and responsibilities that could be imputed to the type-certificate holder from such a notification. The type certificate holder should have no responsibility thrust upon itself to review changed maintenance instructions made by third parties, unless under a voluntary contract between the parties. Lack of a response might be construed, by some, as approval by the type-certificate holder. It would also increase the potential liability upon type-certificate holders, should an unfortunate event occur based on those instructions. We request deletion of this clause.	Existing JAR 145 text. No text changed.
145.A.45 (e)	JAA Harry Jones (JAA Maint. Div)	18	Add the following text at the end of the paragraph: <b><i>"The procedure shall address the need to assess the damage against published approved repair data and the action to be taken if the damage is beyond the limits or outside the scope of such data."</i></b>	The addition of this text adds clarification.	Not considered as rule material. No text changed.
145.A.45 (f)		066	Recommended Change: Add at the end of paragraph (f) the following sentence: for aeroplanes with a maximum takeoff mass below 5,700 kg and helicopters with a maximum takeoff mass below 3175 kg the organization may utilize the current maintenance instructions provided by the type-certificate holder or component manufacturer.	Paragraph (f) is not applicable to general aviation aircraft maintenance. General aviation aircraft and components are typically maintained in conformance with published maintenance instructions from the Original Equipment Manufacturer (OEM). The requirement to transcribe every maintenance instruction for the entire fleet of general aviation aircraft is an insurmountable challenge that will be their components should be able to utilize the OEM maintenance instructions in lieu of work cards. extremely costly and will provide no improvement in aviation safety. General aviation aircraft and	Requirement provides sufficient flexibility to accommodate this issue. No text changed.
145.A.45 (f)	DLH Germany	21	.... <u>For the purpose of routine maintenance (letter checks etc.)</u> complex maintenance tasks shall be transcribed onto the work cards or work sheets and subdivided into clear stages to ensure....	"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.)	There must be a system for non-routine and routine work and this should be specified and controlled, these systems do not have to be exactly the same. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.45 (f)	Mike Newman	40	Last sentence dealing with complex maintenance tasks. The whole sub paragraph (f) gives the impression that all tasks will be transcribed onto work cards or worksheets by the Maintenance Organisation. The sub paragraph needs to inform the reader what happens if such work card/sheets are not produced by the Organisation but a complex task has to be undertaken. We would suggest that the following be added to (f) or note 1. "In the event that stage cards or work sheets have not been produced by the Organisation covering complex tasks then the supervisor or inspector covering that task will raise the necessary stage card or work sheet.		No justification as the present wording covers this subject. No text changed.
145.A.45 (f)	Aerospace Industries Association (AIA)	84	Revise as follows: <b>(f) The organisation shall provide a common work card or worksheet system, or equivalent, to be used throughout relevant parts of the organisation. In addition, the organisation shall either transcribe accurately the maintenance data contained in paragraphs (b) and (d) onto such work cards or worksheets, or equivalent, or make precise reference to the particular maintenance task or tasks contained in such maintenance data. Work cards and worksheets, or equivalent, may be computer generated and held on an electronic data base subject to both adequate safeguards against unauthorised alteration and a back-up electronic data base which shall be updated within 24 hours of any entry made to the main electronic data base. Complex maintenance tasks shall be transcribed onto the work cards or worksheets, or equivalent, and sub-divided into clear stages to ensure a record of the accomplishment of the complete maintenance task.</b>	Different shop systems use different formats to convey acceptable data and the requirement should be for the data accuracy, not format consistency between different organizations. Further, this change should be made in other sections where the same terminology is used.	No justification as the present wording covers this subject. No text changed.
145.A.45 (f)	Lufthansa Technik	25	For the purpose of routine maintenance (letter checks etc.) complex maintenance tasks shall be transcribed onto the work cards or work sheets and subdivided into clear stages to ensure.....	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	There must be a system for non-routine and routine work and this should be specified and controlled, these systems do not have to be exactly the same. No text changed.
145.A.45 (f)	Aerospace Industries Association	170	(f) The organisation shall provide a common work card or worksheet system, or equivalent, to be used throughout relevant parts of the organisation. In addition, the organisation shall either transcribe accurately the maintenance data contained in paragraphs (b) and (d) onto such work cards or worksheets, or equivalent, or make precise reference to the particular maintenance task	Different shop systems use different formats to convey acceptable data and the requirement should be for the data accuracy, not format consistency between different organizations. Further, this change should be made in other sections where the same terminology is used.	There must be a system for non-routine and routine work and this should be specified and controlled, these systems do not have to be exactly the same. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			or tasks contained in such maintenance data. Work cards and worksheets, or equivalent, may be computer generated and held on an electronic data base subject to both adequate safeguards against unauthorised alteration and a back-up electronic data base which shall be updated within 24 hours of any entry made to the main electronic data base. Complex maintenance tasks shall be transcribed onto the work cards or worksheets, or equivalent, and sub-divided into clear stages to ensure a record of the accomplishment of the complete maintenance task.		
145.A.45 (h)	European Regional Airlines Assoc. (ERA)	079	This paragraph states that, for operator provided maintenance data, written confirmation from the operator that all such maintenance data is sufficient. However, we have experience of such customer provided maintenance data not being up to date. Therefore I would recommend that a check be made with the organisation that authored the data as to the revision status of such documentation.		Existing JAR 145 requirement. No text changed.
145.A.45 (h)	Aircraft Electronics Assoc. (AEA)	066	Recommended Change: Amend the first sentence of paragraph (h) to read: "The organization shall establish a procedure to ensure that maintenance data is up to date when required by maintenance personnel."	Paragraph (h) requires that the organization develop a procedure to ensure that the maintenance data it controls is kept up to date. However, paragraph (g) requires only that applicable maintenance data is readily available for use when required by maintenance personnel. Paragraph (h) should therefore require a procedure to ensure that maintenance data is current when required by maintenance personnel.	No justification as the present wording covers this subject. No text changed.
145.A.45 (h)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend the first sentence of paragraph (h) to read: "The organization shall establish a procedure to ensure that maintenance data is up to date when required by maintenance personnel."personnel."	Paragraph (h) requires that the organization develop a procedure to ensure that the maintenance data it controls is kept up to date. However, paragraph (g) requires only that applicable maintenance data is readily available for use when required by maintenance personnel. Paragraph (h) should therefore require a procedure to ensure that maintenance data is current when required by maintenance personnel.	No justification as the present wording covers this subject. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.45 (h)	GAMTA	151	Recommended Change: Amend the first sentence of paragraph (h) to read: "The organization shall establish a procedure to ensure that maintenance data is up to date when required by maintenance personnel."	Paragraph (h). Paragraph (h) requires that the organization develop a procedure to ensure maintenance data it controls is kept up to date. However, paragraph (g) requires only that applicable maintenance data is readily available for use when required by maintenance personnel. Paragraph (h) should require a procedure to ensure that maintenance data is current when required by maintenance personnel.	No justification as the present wording covers this subject. No text changed.
145.A.45 (h)	ENAC, Italy	102	Paragraph 145.A45(h) requires to the maintenance organisation to ensure that maintenance data is kept up to date. No requirement is currently in Part 21 requiring T.C holder and other organisation issuing maintenance data to support this maintenance organisation obligation.		Not covered by Part-145. No text changed.
145.A.45(a)	CAA, Norway	131	It can be an significant burden and very cost ineffectively for an 145-organisation to hold all applicable maintenance data for all aircrafts mentioned in the organizations class rating schedule. They should have the opportunity to get this from the owner (contracted in some way) on a case by case basis for those aircrafts which are seldom maintained in the organization.		This paragraph permits the use of operator/customer supplied data. No text changed.
145.A.45(e)	CAA, UK	123	A.45 (e) is out of context as it is not related to maintenance data. It should either be re-worded or deleted		Text changed.
145.A.45(f)	GAMTA	151	Recommended Change: Add at the end of paragraph (f) the following sentence: for aeroplanes with a maximum takeoff mass below 5,700 kg and helicopters with a maximum takeoff mass below 3175 kg the organization may utilize the current maintenance instructions provided by the type-certificate holder or component manufacturer.	Paragraph (f). Paragraph (f) is not applicable to general aviation aircraft maintenance. General aviation aircraft and components are typically maintenance in conformance with published maintenance instructions from the Original Equipment Manufacturer (OEM). The requirement to transcribe every maintenance instruction for the entire fleet of general aviation aircraft is an insurmountable challenge that will be extremely costly and will provide no improvement in aviation safety. General aviation aircraft and their components should be able to utilize the OEM maintenance instructions in lieu of work cards.	No justification as the present wording covers this subject. No text changed.
145.A.45(f)	BDLI	148	....For the purpose of routine maintenance (letter checks etc.) complex maintenance tasks shall be transcribed onto the work cards or work sheets and subdivided into clear stages to ensure.....	"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	There must be a system for non-routine and routine work and this should be specified and controlled, these systems do not have to be exactly the same. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				manual, Maintenance manual, Structural repair manual etc.)	
145.A.46	JAA Harry Jones (JAA Maint. Div)	18	<i>Before the commencement of maintenance a written work order or contract must be agreed between the organisation and the customer to clearly establish the maintenance to be carried out. If during maintenance it is established that further work is necessary, then such work must be agreed with the customer.</i>	The addition of such a paragraph will emphasise the “work order/contract requirement” and allow reference to “work orders” to be removed from 145.65(b).	Already covered by 145.A.65. No text changed.
145.A.47	GAMTA	151	Recommended Change: Renummer paragraph (b) and (c) to (1) and (2) respectively.	Paragraph (b) and (c). Paragraph (b) and (c) refer to tasks that are contained within the production planning system. The system must take into account human performance and change over of maintenance tasks at shift change. These requirements are part of the overall production planning system and therefore the numbering system of 145.A.47 should reflect their hierarchy.	Change not justified.
145.A.47 (b)	Zodiac Group, France	33	The planning of maintenance tasks, and the organising of shifts, shall take into account <del>human performance limitations</del> <b>personnel skills</b>	Improper utilisation of the terms “human performance” and “human factor” [145 A 30 (e), 145 A 35 (d), 145 A 47 (b), 145 A 65 (b) ] The “human performance “ and the “human factor” will not be able to be checked. “personnel skills” will be able to take the place for the “human performance” and “human factor” in the whole Part 145.	Human factors and human performance are widely recognised terms that already exist in JAR 145 Amendment 5. No text changed.
145.A.47 (b) ©	Aircraft Electronics Association (AEA)	092	Recommended Change: Renummer paragraph (b) and (c) to (1) and (2) respectively.	Paragraph (b) and (c) refer to tasks that are contained within the production planning system. The system must take into account human performance and change over of maintenance tasks at shift change. These requirements are part of the overall production planning system and therefore the numbering system of 145.A.47 should reflect this hierarchy. data which should not be transferred to the aircraft operator. Not all modification data is necessary	Change not justified.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.47 (c)	JAA Harry Jones (JAA Maint. Div)	18	Add to last sentence: ...and incoming personnel <i>in accordance with a procedure acceptable to the Member State.</i>	The amended text highlights the need to have a procedure for this activity. Without this it will be almost impossible to enforce.	Procedures are generically covered in 145.A.65. No text changed.
145.A.50	Flyvedlikehold, Norway	135	The CRS should be a standardized certificate, like the EASA Form One, for all ECAR-145 Organizations. The certificate should/must include the following (like part 13 of Form One) references on all items performed: - All items - Reference to the applicable Maintenance Data (including revision, and chapter) - All component changes - P/N (and S/N where applicable) out and in, with reference to the approved EASA Form One, 8130-3 or equivalent. - All modifications - Reference to approved data or (for small modifications) data made by the organization as documentation of the modification. - All repair - Reference to approved data or (for small repair) data made by the organization as documentation of the repair. The work sheets / snag sheets should be approved so they also can have the same references.		This aspect would be a new requirement that does not exist in JAR 145 and would have a major impact on technical log systems with no justification. No text changed.
145.A.50	GAMTA	151	Recommended Change: Correct every reference to the “certificate of release” to read; “Authorized Release Certificate.”	The reference to “certificate of release” is inconsistent with the EAS Form 1, contained in Appendix 1. EASA Form 1 is titled: “Authorized Release Certificate”. Chapter 145.A.47 should correctly refer to the “Authorized Release Certificate” so that the reader will not mistake the certificate of release and another form.	This would limit the release to components only. This was deemed to be incorrect, in addition this is also existing JAR 145 text. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50	DGAC, France	162	<p>i) Multiple releases should be clarified                      ii) Modify paragraph (b) as follows:</p> <p>“(b) A certificate of release to service shall be issued before flight at the completion of any package of maintenance containing one of the following elements:                      (1) checks or inspections from the aircraft maintenance program;                      (2) airworthiness directive implementation, overhaul of aircraft or components, repairs to aircraft or components, modifications, component replacements and defect rectification;                      (3) any other applicable <u>customer</u> maintenance requirements.”</p> <p>III – Modify paragraph (d) as follows:                      “[...] A certificate of release to service shall contain:                      (1) <i>reference to the work order, if applicable; and</i>                      (2) basic details of the maintenance carried out; and                      (3) the date when such maintenance was completed; and                      (4) <u>the location where the maintenance was carried out;</u>  <u>and</u>                      (5) the identity of the organisation, including its approval reference and that of its certifying staff issuing such a certificate; <u>and</u>                      (6) <u>a statement that, unle</u></p>	<p>I – The problem of multiple releases is still not clear (who is responsible to ensure that everything has been done before the aircraft returns to service ?). If this problem can not be solved during this consultation, the subject should be added to the future Agency work programme.</p> <p>II – Editorial: Large aircraft owners will also Part 145 organisations' customers                      Note : All Part 145 has not been checked for this mistake.</p> <p>III – Implementation problem                      The certificate should refer to a work order, when it exists, in order to enable traceability of the maintenance activities.                      As a certificate of release to service must be written at the time and location of the work performed, it should contain these information.                      A standard release statement should be included in Part 145.</p> <p>IV – Basic principles                      The release to service certification is a final process which confirm that all works to be performed before to release to service an aircraft or a component have been performed by the maintenance organisation accordingly w</p>	<p>This would require a change to the intent of the existing JAR 145 Amendment 5 text.                      No text changed.</p>

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50				<p>performed on it. Generally, when there are several tasks, even associated to different specialities (mechanics, cabin, avionics, structure...), one leader is designated by the line maintenance organisation to manage all the works to perform (except in the case of check duration more than 10 hours), to co-ordinate all tasks together and to define the priority to perform the tasks.</p> <p>At the end of a Line maintenance check, the final verification that all tasks performed and all different items to be differed are acceptable before the release to service an aircraft must be done by one and only one leader, certifying staff. Pratically, the technical crew must have only one technical green light (CRS) by one person. This leader should naturally be the certifying staff for the line maintenance check who issues the global CRS in the tech log. This solution is generally in place in the Line maintenance organisations and operators.  V – <u>Implementation problem</u>  The PART145 requires the use of a specific form for the relea</p>	
145.A.50	DGAC, France	162	<p>In paragraph 145.A.50 add a new paragraph(i) as follows:  “(i) For the “Limited Aircraft or Component Maintenance Organisation”, certification of the maintenance shall be formalised by the issuing of a PART145 conformity certificate.  This certificate of conformity should precise that the work has been performed in compliance with the PART145 except for 145.A.30 (g), (h)(1) &amp;(2), (i) and does not replace the need of a final PART145 certificate of release to service for the aircraft or component concerned.”  This possibility of PART145 conformity certificates must be used also by any PART145 approved maintenance organisation when the customer orders do not include all works to perform before to release the aircraft or component (partial work orders).</p>	Refer to 145.A.30 reason.	There is no requirement for the Limited Component Maintenance organisation in JAR 145. No text changed.
145.A.50	Rolls Royce, Germany	65	Text is inconsistent with Part M, M.A.612 & 613.		Part-145 is a more stringent requirement than Part-M, Section A, Subpart F therefore differences will exist. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50	Aircraft Electronics Association (AEA)	092	Recommended Change: Correct every reference to the "certificate of release" to read; "Authorized Release Certificate."	The reference to "certificate of release" is inconsistent with the title of EASA Form 1 contained in Appendix 1. EASA Form 1 is titled: "Authorized Release Certificate". Chapter 145.A.50 should correctly refer to the "Authorized Release Certificate" so that the reader will not mistake the certificate of release and another form.	This would limit the release to components only this is also existing JAR 145 text. No text changed.
145.A.50 (a)	JAA Harry Jones (JAA Maint. Div)	18	<b>Amend the first sentence of the paragraph as follows:</b> .....shall be issued by appropriately authorised certifying staff <b>on behalf of the organisation</b> when <b>satisfied</b> that.....with the procedures specified in <b>the 145.70 exposition.....</b>	The amended text highlights the fact that the certifying staff issue the CRS on behalf of the organization in accordance with the procedures in the exposition. As previously written this was not clear.	Text changed but not as proposed.
145.A.50 (a)	Aerospace Industries Association (AIA)	84	A certificate of release to service <u>for the work performed</u> shall be issued by appropriately authorized certifying staff when it has been verified that all maintenance <del>required</del> directed by the customer of the aircraft or component has been properly carried out by the organisation in accordance with the procedures specified in 145.A.70, taking into account the availability and use of the maintenance data specified in 145.A.45; and that there are no non-compliances which are known that could hazard flight safety <u>that have not been disclosed to its customer by the maintenance organization as a result of its actual knowledge or which should have been found in performing to the customers directed scope of work.</u>	It needs to be clear that a maintenance organization is only responsible for the work it accomplishes and that it cannot be liable for not performing work that is outside of the customer directed scope of work. In many cases, a maintenance organization will only be contracted for a limited scope of work and the last portion of the draft text seemingly implies that it must repair all discrepancies. Who will fix a discrepancy is a customer decision and the maintenance organization should only be held to notifying its customer of non-remedied discrepancies of which it has actual knowledge or which should have been found within its contracted scope of work. Further, Insert the phrase " <u>for the work performed</u> " after "release to service" in all other places where it appears throughout Part 145	Text changed but not as required.
145.A.50 (b)	Dassault Falcon Service France	13	A certificate ... at the completion of any package of maintenance <del>containing:-</del> (1) <del>checks or inspections...</del> (2) <del>....</del> (3) <del>Any other applicable operator maintenance requirements.</del>	A certificate of release to service has to be issued after any package of maintenance.	Text changed.
145.A.50 (b)	Maintenance Division JAA	12	at the completion of any package of maintenance containing <b>any</b> one of the following delete "package" in the term "maintenance package		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50 (b)	European Regional Airlines Assoc. (ERA)	079	I believe the phrase “containing one of the following elements” should be replaced by the phrase “containing one or more of the following elements”		Text changed.
145.A.50 (b)	CAA, UK	123	Should be at the completion of any ‘maintenance activity’ not ‘package of maintenance’ otherwise the line techlog defect rectification is not applicable. AMC145.50(a) 2 used to refer to this situation but we removed it. Such defect rectification is not part of a maintenance package		Text changed.
145.A.50 (b)	CAA, UK	123	This paragraph requires additional wording to clarify the requirement. ‘A certificate of release to service shall be issued before flight at the completion of any package of maintenance containing any one of the following elements:’		Text changed.
145.A.50 (d)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend the second sentence to read: “The authorized release certificate or airworthiness approval tag identified as Agency Form One in appendix 1 to this Part, or equivalent, constitutes the component certificate of release to service.”	The second sentence in paragraph (d) indicates that an Agency Form One constitutes the component certificate of release to service. This language is restrictive and should include equivalent forms from non-EU/EASA repair stations.	Bilateral certificates and equivalent certificates are dealt with in the AMC to 145.A.42(a). No text changed.
145.A.50 (d)	Maintenance Division JAA	12	delete “Agency”. Should be EASA Form 1 Points 1-3 should be moved to paragraph (a)		Text changed
145.A.50 (d)	European Regional Airlines Assoc. (ERA)	079	This paragraph states that a CRS in the guise of a Form 1 is required at the completion of any maintenance on a component whilst off the aircraft. This needs to be amended to allow for removed for ease of maintenance or access, such as is the maintenance that has been accomplished on a component case for engines. This situation is permissible by paragraph M.A.502 (b) of Part M.		Text changed but not as proposed.
145.A.50 (d)	CAA, UK	123	An ‘Agency’ form one is used this should be an ‘EASA’ form one		Text changed.
145.A.50 (d)	CAA, UK	123	The paragraph starting ‘A certificate of release to service...’ should either be part of A.50 (b) or a separate paragraph in its own right. It implies it is only for the EASA Form 1.		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50 (d)	GAMTA	151	Recommended Change: Amend the second sentence to read: "The authorized release certificate or airworthiness approval tag identified as Agency Form One in appendix 1 to this Part, or equivalent, constitutes the component certificate of release to service."	Paragraph (d). The second sentence in paragraph (d) indicates that an Agency Form One constitutes the component certificate of release to service. This language is restrictive and should include equivalent forms from non-EU/EASA repair stations.	A Part-145 organisation does not issue equivalents but may accept certain equivalents. No text changed.
145.A.50 (e)	Aerospace Industries Association (AIA)	84	Revise as follows: (e) By derogation to paragraph (a), when the organisation is unable to complete all maintenance required directed by the aircraft operator, it may issue a certificate of release to service for the work performed within the approved aircraft operators' limitations. The organisation shall enter such fact in the aircraft certificate of release to service before the issue of such certificate.	Based on the comment above to 145.A.50 (a), this paragraph is modified to reflect the intent of those changes. Again, the authorized maintenance organization is only responsible to perform that work directed by the customer.	Text changed but not as proposed.
145.A.50 (e)	CAA, UK	123	Due to typographical error, amend paragraph to read: '.it may issue a certificate of release to service within the aircraft operators' approved limitations.'		Text changed.
145.A.50 (e)	Aerospace Industries Association	170	(e) By derogation to paragraph (a), when the organisation is unable to complete all maintenance required directed by the aircraft operator, it may issue a certificate of release to service for the work performed within the approved aircraft operators' limitations. The organisation shall enter such fact in the aircraft certificate of release to service before the issue of such certificate.	Based on the comment above to 145.A.50 (a), this paragraph is modified to reflect the intent of those changes. Again, the authorized maintenance organization is only responsible to perform that work directed by the customer.	Text changed.
145.A.50 (e)	ENAC, Italy	102	In paragraph 145.A50(e) there is no link to Part 21 Subpart M, paragraph 21A445 that deals with unrepaired damage.		The text specified covers the intent of 21.A.445. No text changed.
145.A.50 (f)	JAA Harry Jones (JAA Maint. Div)	18	<b>Amend the first sentence text as follows...</b> whichever is sooner subject to the aircraft operators agreement and said component having a suitable <b>serviceable tag</b> but otherwise <b>being</b> in compliance with all <b>other</b> applicable maintenance and operational requirements.	The reason for this change is to aid interpretation and lessen the chance of confusion stemming from the repeated use of the words "release certificate". The other changes are editorial but necessary.	Text changed but not as proposed.
145.A.50 (f)	JAA Harry Jones (JAA Maint. Div)	18	Delete the word "above" from the last sentence.. It is superfluous.	Also, the first sentence indicates "a maximum of 30 flight hours" deleting the word "above" allows a specific time below that "maximum" to be prescribed if necessary	Text changed.
145.A.50 (f)	DLH Germany	21	Suitable release certificate" is a new term and needs clarification/definition in AMC's.		Definition is given in the AMC. No text changed.
145.A.50 (f)	CAA, UK	123	Additional reference required. 'By derogation to paragraph (a) and 145.A.42(a), when an aircraft.....'		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.50 (f)	CAA, UK	123	'...it is permissible to temporarily fit a component without the appropriate release certificate.....subject to the aircraft operator agreement and said component having a suitable <u>serviceable tag release certificate</u> but otherwise in compliance with all applicable maintenance and operational requirements.'	Contradictory wording. If the intent of this paragraph is to reflect the previous position under JAR 145, the difference between appropriate release certificate and suitable release certificate does not adequately define the position. The previous JAR 145 wording accomplished this adequately.	Definition is given in the AMC. No text changed.
145.A.50(a)	Aerospace Industries Association	170	(a) A certificate of release to service <u>for the work performed</u> shall be issued by appropriately authorized certifying staff when it has been verified that all maintenance required directed by the customer of the aircraft or component has been properly carried out by the organisation in accordance with the procedures specified in 145.A.70, taking into account the availability and use of the maintenance data specified in 145.A.45; and that there are no non-compliances which are known that could hazard flight safety that <u>have not been disclosed to its customer by the maintenance organization as a result of its actual knowledge or which should have been found in performing to the customers directed scope of work.</u>	It needs to be clear that a maintenance organization is only responsible for the work it accomplishes and that it cannot be liable for not performing work that is outside of the customer directed scope of work. In many cases, a maintenance organization will only be contracted for a limited scope of work and the last portion of the draft text seemingly implies that it must repair all discrepancies. Who will fix a discrepancy is a customer decision and the maintenance organization should only be held to notifying its customer of non-remedied discrepancies of which it has actual knowledge or which should have been found within its contracted scope of work. Further, Insert the phrase "for the work performed" after "release to service" in all other places where it appears throughout Part 145	Text changed but not as required.
145.A.50(a)	LFV, Sweden	105	last sentence should read: "and that there are no non-compliances which are known that could endanger aviation safety".		Existing JAR 145 text. No text changed.
145.A.50(b)	LBA	053	Change "containing one of" to "containing a least one of"		Text changed but not as required.
145.A.50(d)	LBA	053	Change "Agency" to "EASA"	The title of the form is "EASA Form One"	Text changed.
145.A.50(e)	LBA	053	Definitions for "main line station" and "main maintenance base" are not existing.	A definition for such locations is needed.	Text changed but not as required see AMC definitions.
145.A.55 (c) (3)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend Paragraph (c)(3) to read: "Where an organization approved under this Part terminates its operation, all retained maintenance records covering the last two years shall be stored as specified by the competent authority."	While paragraph (c)(3) obviously had good intentions, it is illogical. Most general aviation maintenance organizations that close their doors do so for financial reasons. The requirement imposed by paragraph (c)(3) to distribute ALL maintenance records to each aircraft and component owner or customer is a financial burden that cannot be assumed by a bankrupt organization. The last two years of maintenance records of an organization should be managed as specified by the competent authority.	Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.55 (a)	Zodiac Group, France	33	The organisation shall record all details of maintenance work carried out in a form and a manner <b>established by acceptable to</b> the competent authority.	The form and the manner to record work are specific for each organisation or business category. A generic form will not be adequate.	Text changed but not as proposed.
145.A.55 (a)	IVW, The Netherlands	99	Records must be <b>“acceptable”</b> 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 but not as proposed.
145.A.55 (a)	CAA, UK	123	‘The organisation shall record all details of maintenance work carried out in a form <u>acceptable to</u> <del>established by</del> the competent authority.’	Use of the term ‘established by’ indicates that competent authority will be prescribing the format of worksheets, maintenance statements etc to be used.	Text changed but not as proposed.
145.A.55 (b)	Aerospace Industries Association (AIA)	84	Revise as follows: (b)The organization shall provide or retain a copy of each certificate of release to service for the work performed, other than the final release to service for the work performed, to the aircraft operator or its customer, together with a copy of any specific approved repair/modification data used for repairs/modifications carried out”	The requirement as written raises several issues. As maintenance organizations subcontract work, it should be acceptable for the maintenance organization to retain copies of subcontract documents in its records management system rather than making copies and only issuing the final release document to its customer, which may not be an aircraft operator. The issue of the scope of a release to service was explained previously. The deleted phrase could be interpreted to require that a maintenance organization provide copies of all of its work documents, including maintenance manuals; this would be a massive paperwork requirement with no benefit as the organization would have to maintain such documentation in its records system in any event.	Existing JAR 145 text no justification for change.
145.A.55 (b)	Aircraft Electronics Association (AEA)	092	Recommended Change: Replace the word “specific” with the word “relevant” so that the sentence reads: “The organization shall provide a copy of each certificate of release to service to the aircraft operator, together with a copy of any relevant approved repair/modification data used for repairs/modification carried out.”	Paragraph (b) requires an organization to provide the aircraft operator with any specific approved for the continued airworthiness of modified aircraft. The operator should receive a copy of all “relevant” modification data however, proprietary or business sensitive data not related to the continued airworthiness of the repair/modification should not be required to be given to the operator.	Existing JAR 145 text no justification for change.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.55 (b)	GAMTA	151	Recommended Change: Replace the word "specific" with the word "relevant" so that the sentence reads: "The organization shall provide a copy of each certificate of release to service to the aircraft operator, together with a copy of any relevant approved repair/modification data used for repairs/modification carried out."	Paragraph (b) requires an organization to provide the aircraft operator any specific approved modification data. This requirement does not take into account data which may contain proprietary data which should not be transferred to the aircraft operator. Not all modification data is necessary for the continued airworthiness of modified aircraft. The operator should receive a copy of all "relevant" modification data.	Existing JAR 145 text no justification for change.
145.A.55 (b)	Aerospace Industries Association	170	<b>Revise as follows:</b> (b)The organization shall provide <u>or retain a copy of</u> each certificate of release to service for the work performed, other than the final <u>release to service for the work performed</u> , to the aircraft operator <u>or its customer</u> , <del>together with a copy of any specific approved repair/modification data used for repairs/modifications carried out</del> ."	The requirement as written raises several issues. As maintenance organizations subcontract work, it should be acceptable for the maintenance organization to retain copies of subcontract documents in its records management system rather than making copies and only issuing the final release document to its customer, which may not be an aircraft operator. The issue of the scope of a release to service was explained previously. The deleted phrase could be interpreted to require that a maintenance organization provide copies of all of its work documents, including maintenance manuals; this would be a massive paperwork requirement with no benefit as the organization would have to maintain such documentation in its records system in any event.	Existing JAR 145 text no justification for change.
145.A.55 (c) (3)	European Regional Airlines Assoc. (ERA)	079	This paragraph requires an organisation that terminates its operation to store any maintenance records, for which the owner or customer cannot be traced, as specified by the competent authority. Can the Agency specify how this will be covered by an organisation that is no longer in business i.e. that has ceased to trade?		Text changed.
145.A.55 (c) (3)	GAMTA	151	Recommended Change: Amend Paragraph (c)(3) to read: "Where an organization approved under this Part terminates its operation, all retained maintenance records covering the last two years shall be stored as specified by the competent authority."	Paragraph (c) (3). While paragraph (c)(3) obviously had good intentions, it is illogical. Most general aviation maintenance organizations that close their doors do so for financial reasons. The requirement imposed by paragraph (c)(3) to distribute ALL maintenance records to each aircraft and component owner or customer is a financial burden that cannot be assumed by a bankrupt organization. The last two years of maintenance records of an organization should be managed as specified by the competent	Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				authority.	
145.A.60 (a)	Zodiac Group, France	33	The organisation shall report to the <del>competent authority and to the authority responsible for the design of the aircraft or component</del> <b>Agency or the competent authority of the Member State, or both,</b> any condition of the aircraft or component identified by the organisation ...	For the consistency with Part 21 on this subject.	Requirements placed on a Part-145 organisation for occurrence reporting are different from those mandated by Part 21. No text changed.
145.A.60 (a)	Aerospace Industries Association (AIA)	84	Revise as follows: (a) The organisation shall report to the competent authority, type-certificate holder/manufacturer and to the authority responsible for the design of the aircraft or component identified by the organisation that has resulted or may result in an unsafe condition that could seriously hazard the aircraft, except where such condition is discovered at maintenance and the rectification of such condition is addressed in the acceptable maintenance data.	The first addition assures that the certificate holder has notice of field problems so that appropriate action may be taken. The second addition is intended to reduce the “judgement calls” as to whether a deficiency should be reported. If a repair is already provided for, there should be no requirement to report it.	Text changed but not as proposed.
145.A.60 (a)	IVW, The Netherlands	99	CAA-NL suggests to change the occurrence reporting to the “authority” responsible for the design into the <b>“organisation”</b> responsible for the design, to bring this in line with ICAO SARP's.		Text changed.
145.A.60 (a)	Aerospace Industries Association	170	Revise as follows: (a) The organisation shall report to the competent authority, <del>type-certificate holder/manufacturer</del> and to the authority responsible for the design of the aircraft or component any condition of the aircraft or component identified by the organisation that has resulted or may result in an unsafe condition that could seriously hazard the aircraft, <del>except where such condition is discovered at maintenance and the rectification of such condition is addressed in the acceptable maintenance data.</del>	The first addition assures that the certificate holder has notice of field problems so that appropriate action may be taken. The second addition is intended to reduce the “judgement calls” as to whether a deficiency should be reported. If a repair is already provided for, there should be no requirement to report it.	Text changed but not as proposed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.60 (b)	Aerospace Industries Association (AIA)	84	This section should be deleted, as it should be the responsibility of the type-certificate holder to identify adverse trends and corrective actions. Maintenance organizations, particularly non-airline independent stations have a mix of parts from different operating environments and customers that would not typically generate valid assessments.		Existing JAR 145 text. No text changed.
145.A.60 (b)	Aerospace Industries Association	170	This section should be deleted, as it should be the responsibility of the type-certificate holder to identify adverse trends and corrective actions. Maintenance organizations, particularly non-airline independent stations have a mix of parts from different operating environments and customers that would not typically generate valid assessments.		Existing JAR 145 text. No text changed.
145.A.60 (c)	British Airways Maintenance Cardiff	97	The organisation shall make such reports in a form and manner established by the agency..... etc	Will the form be common through all the authorities?	The format of the form has not been defined. No text changed.
145.A.60 (d)	IVW, The Netherlands	99	It is the responsibility of the operator to inform his authority on occurrences, CAA-NL suggests therefore to delete the last sentence of this paragraph.		Text changed.
145.A.65 (b)	JAA Harry Jones (JAA Maint. Div)	18	Add <b>"145"</b> after the word Part, and delete <b>"which shall include a clear work order or contract"</b>	As this has been transferred to the suggested 145.A.46.	No justification as the present wording covers this subject. No text change.
145.A.65 (b) (3)	Maintenance Division JAA	12	to minimise the risk of multiple errors and capture errors on critical systems <b>and to</b> ensure that no person re-word text revert to original CG7 proposal		Text changed.
145.A.65 (b) (3)	Aircraft Electronics Association (AEA)	092	Recommended Change: Define critical systems.	Paragraph (b)(3) requires that an organization establish procedures to minimize the risk of multiple defined so that this paragraph is not misinterpreted and an undue burden is therefore placed on general aviation organizations. General aviation maintenance organizations are uniquely affected by this provision because of their small size and typically few employees.	As defined in Part-21.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.65 (b) (3)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend the first sentence to read: "With regard to aircraft line and base maintenance, the organization shall establish procedures to minimize the risk of multiple errors and capture errors on critical systems. Ensure that no person is required to carry out and inspect in relation to maintenance tasks of critical systems involving some element of disassembly/reassembly of several components of the same type fitted to more than one system on the same aircraft during a particular maintenance check." maintenance and inspection tasks of critical systems.	Paragraph (b) (3). In is unclear whether the requirement of paragraph (b)(3) to ensure that no person is required to carry out and inspect in relation to maintenance tasks applies to any system or just critical systems. Paragraph (b)(3) needs to be clarified such that the requirements apply to maintenance and inspections tasks of critical systems	Existing text is deemed to adequately cover this situation. No text changed.
145.A.65 (b) (3)	GAMTA	151	Recommended Change: Define critical systems.	Paragraph (b) (3). Paragraph (b)(3) requires that an organization establish procedures to minimize the risk of multiple errors and capture errors on critical systems. The term critical systems is ambiguous and needs to be defined so that this paragraph is not misinterpreted and an undue burden is therefore placed on general aviation organizations.	As defined in Part-21.
145.A.65 (b) (3)	GAMTA	151	Recommended Change: Amend the first sentence to read: "With regard to aircraft line and base maintenance, the organization shall establish procedures to minimize the risk of multiple errors and capture errors on critical systems. Ensure that no person is required to carry out and inspect in relation to maintenance tasks of critical systems involving some element of disassembly/reassembly of several components of the same type fitted to more than one system on the same aircraft during a particular maintenance check."	Paragraph (b) (3). In is unclear whether the requirement of paragraph (b)(3) to ensure that no person is required to carry out and inspect in relation to maintenance tasks applies to any system or just critical systems. Paragraph (b)(3) needs to be clarified that the requirements apply to maintenance and inspection tasks of critical systems.	Existing text is deemed to adequately cover this situation. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.65 (c)	DGAC, France	162	“(c) The organisation shall establish a quality system that includes the following: (1) Independent audits in order to monitor compliance with required aircraft/ aircraft component standards and adequacy of the procedures to ensure that such procedures invoke good maintenance practices and airworthy aircraft / aircraft components. Independent audits, including system audits and product audits, shall ensure that all aspects of compliance to this Part are checked every 12 months, or in a period not exceeding 24 months based on competent authority agreement, according to a scheduled plan. In the smallest organisations the independent audit part of the quality system may be contracted to another organisation approved under this Part or a person with appropriate technical knowledge and proven satisfactory audit experience; and (2) A quality feedback reporting system to the person or group of persons specified in 145.A.30(b) and ultimately to the accountable manager that ensures proper and timely corrective action	<u>Implementation problem:</u> Audits must be carried out on products and procedures in order to check the validity of the maintenance practices on all lines of products. A schedule plan should avoid that all audits are made in the same time period on the products available at that moment. The responsibility of the accountable manager implies knowledge of the state of conformity of the organisation.	Covered by AMC. No text changed.
145.A.65 (c) (1)	LBA	053	The person with appropriate technical knowledge shall be accepted by the competent authority. This position is so important that only accepted personnel should be allowed to do this work.		This proposal is a new requirement for an issue that is dealt with via the exposition approval process. No text changed.
145.A.65 (c) (1)	JAA Harry Jones (JAA Maint. Div)	18	at the end of the paragraph add: .....audit experience <b>acceptable to the competent Authority</b> and.....	The addition of this text clarifies the fact that the person must be acceptable to the “competent authority”, without this there is no indication to whom the person must show the necessary experience/knowledge.	This activity is overseen by the Authority and there is therefore no need to be "accepted". No text changed.
145.A.65 (c) (1)	Mike Newman	40	Last sentence, ending with "satisfactory audit experience", add following words "and acceptable to the competent authority".		This activity is overseen by the Authority and there is therefore no need to be "accepted". No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.65 (c) (1)	Aircraft Electronics Association	137	Recommended Change: Amend Paragraph (c)(1) by deleting the last sentence and replacing it with: “The ensure that small maintenance organizations continue to meet the requirements of this subpart, it shall organize, on a regular basis, organizational reviews. Coupled with regular organizational reviews, the oversight of the competent authority of the maintenance organization meets the intent of and requirement for an independent audit for small maintenance organization.	Paragraph (c)(1) discriminates against small businesses by requiring a greater percentage of available resources to meet the quality regulations proposed by Section 145.A.65 than large corporate organizations must expend to reach the same result. Paragraph (c)(1) mandates independent audits and to assist small businesses allows a reciprocal audit program between small organizations. However, while a large corporation may expend 1 percent of less of their available resources to fulfill this requirement, a small business employing four technicians typically would have to dispatch their chief inspector to audit a “partnered” small business thereby costing the business 25 percent of their daily productivity plus a reduced productivity of the remaining staff due to lack of supervision. Where independent audits of large organization is justified due to the size and complexity of the business and levels of organizational structure, small businesses typically do not have the size, complex corporate structure or organi	This was an existing JAR 145 requirement. No text changed.
145.A.65 (c) (1)	LBA	053	The wording “smallest organisation” should be defined in correlation with Part M.		The AMC Clarifies this issue and is consistent with Part-M.
145.A.70	Nayak Air Services Netherlands	88	The maintenance organization should be able to keep separate documents or electronic data files outside the MOE as specified in JAR-145.70 (b), this to ensure that alterations on for example the list of certifying staff, can be made without having to change the MOE each occasion.		This is already a possibility as detailed in the AMC.
145.A.70	Air France	86	Add the following note : The information specified in sub paragraphs (6) and (12) to (16) inclusive, whilst a part of the maintenance organisation exposition, may be kept as separate documents or on separate electronic data files subject to the management part of said exposition containing a clear cross reference to such documents or electronic data files.	<u>Impractical</u> <u>Quoted documents may be computerised upon management decision</u>	This is already a possibility as detailed in the AMC.
145.A.70 (a)	GAMTA	151	Recommended Change: Amend paragraph (a)(16) to read: a list of contracted Part 145 organizations, where applicable.	Paragraph (a) (16). Paragraph (a)(16) and paragraph (a)(14) currently apply to the same sub-contracted organizations. Based on the language of JAR 145, it appears that the intent of paragraph (a)(16) was to apply to contracted Part 145 organizations, where paragraph (a)(14) was	Contracted organisations may not only be Part-145 organisations they may also be “bilateral partners”. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				intended to apply to sub-contracts to non-certificated organization.	
145.A.70 (a) (1)	CAA Belgium	16	There should be a requirement in the line of: 145.A.XYZ Maintenance standards All work shall be carried out in accordance with the requirements of this part, part M and the maintenance organisation exposition, at all times.	In our opinion, the statement asked for, in 145.A.70,(a),(1), is not sufficient to put a legally binding obligation on the organisation to use the manual. To be consistent with Part M, and in particular with subpart G and F	The Statement when signed by the accountable manager is legally binding. No text changed.
145.A.70 (a) (1)	Aerospace Industries Association (AIA)	084	Revise as follows 1) A statement signed by the accountable manager confirming that the maintenance organisation exposition and any referenced associated manuals define the organisation's compliance with this Part and will be complied with at all times. When the accountable manager is not the chief executive officer highest officer of the maintenance organisation then such chief executive highest officer shall countersign the statement.	The requirement that the "chief executive officer of the organization" countersign with the accountable manager "when the accountable manager is not the chief executive officer" can be interpreted that such a signature must go up a corporate chain to the highest level. The signer needs to be the highest responsible party within the maintenance organization rather than the possible interpretation of a CEO remote from the operations.	Text changed.
145.A.70 (a) (13)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend paragraph (a)(13) to read: a list of commercial operators, where applicable, to which the organization provides an aircraft maintenance service;	The burden of paragraph (a)(13) to list EVERY operator essentially requires a general aviation maintenance organization to list and receive approval of every customer since each general aviation aircraft is operated independently. The original language of JAR 145 required the listing of JAROPS operators. This intent should transfer to EASA Part 145 and require only the listing of commercial operators.	Text changed.
145.A.70 (a) (13)	DLH Germany	021	There is no need for a maintenance organisation to list its customers in its organisation exposition. In case of adhoc maintenance (for example supporting another operator performing an engine change on his line station which is at the same time a maintenance location of the performing MO, this requirement cannot be fulfilled. The explicit requirement to list certifying staff, capability lists etc. as an integral part of the MOE leads to the necessity of very frequent revisions; it would be advisable to keep these lists updated as appendices of the MOE.	It is the responsibility of the operator to negotiate his contracted maintenance activities with his member state!	This is already a possibility as detailed in the AMC.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.70 (a) (13)	BDLI	148	The explicit requirement to list certifying staff, capability lists etc. as an integral part of the MOE leads to the necessity of very frequent revisions; it would be advisable to keep these lists updated as appendices of the MOE.		This is already a possibility as detailed in the AMC.
145.A.70 (a) (13)	BDLI	148	There is no need for a maintenance organisation to list its customers in its organization exposition. In case of adhoc maintenance (for example supporting another operator performing an engine change on his line station which is at the same time by a maintenance location of the performing MO, this requirement cannot be fulfilled.	It is the responsibility of the operator to negotiate his contracted maintenance activities with his member state!	This is already a possibility as detailed in the AMC.
145.A.70 (a) (16)	Aircraft Electronics Association (AEA)	092	Recommended Change: Amend paragraph (a)(16) to read: a list of contracted Part 145 organizations, where applicable.	Paragraph (a)(16) and paragraph (a)(14) currently apply to the same sub-contracted organizations. Based on the language of JAR 145, it appears that the intent of paragraph (a)(16) was to apply to contracted Part 145 organizations, where paragraph (a)(14) was intended to apply to sub-contracts with non-certificated organization.	Contracted organisations may not only be Part-145 organisations they may also be "bilateral partners". No text changed.
145.A.70 (a) (2)	CAA, UK	123	Should refer to 145.A.65 (a)		Text changed.
145.A.70 (a) (2) (4)	Maintenance Division JAA	012	References need to include Section A e.g. 145.A.65		Text changed.
145.A.70 (a) (4)	CAA, UK	123	Should refer to 145.A.30 (b)		Text changed.
145.A.70 (a) (6)	LBA	053	"B1 and B2 support staff" should be added in this subparagraph in accordance with 145.A.30(h)(1)(ii).		Text changed.
145.A.70 (a) 13	Lufthansa Technik	025	The explicit requirement to list certifying staff, capability lists etc. as an integral part of the MOE leads to the necessity of very frequent revisions; it would be advisable to keep these lists updated as appendices of the MOE.		This is already a possibility as detailed in the AMC.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.70 (a) 13	Lufthansa Technik	025	There is no need for a maintenance organisation to list its customers in its organisation exposition. In case of adhoc maintenance (for example supporting another operator performing an engine change on his line station which is at the same time a maintenance an engine change on his line station which is at the same time by a maintenance location of the performing MO, this requirement cannot be fulfilled. It is the responsibility of the operator to negotiate his contracted maintenance activities with his member state!		This is already a possibility as detailed in the AMC.
145.A.70 (b)	CAA Belgium	016	The maintenance organisation exposition shall be amended as necessary to remain an up to date description of the organisation. <b>The maintenance organisation exposition and</b> any amendment thereof, shall be approved by the competent authority.	- The first issue of the manual must also be subject to the approval of the authority.	Text changed.
145.A.70 (b)	DGAC, France	162	“(b) The maintenance organisation exposition shall be amended as necessary to remain an up to date description of the organisation. Any <u>The amendment procedure</u> shall be approved by the competent authority.” Amend 145.B.35 accordingly by deleting last paragraph.	<b>Implementation problem:</b> 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 See also comment to M.A.604	Dealt with in the AMC to 145.B.35. No text changed.
145.A.70 (b)	LBA	053	The former wording for the approval of the initial M.O.E. should be added.		Text changed.
145.A.70 (c)	European Regional Airlines Assoc. (ERA)	079	The word “Mmoved” should be replaced with “Moved”.	This paragraph within the Attachment Explanatory Note to Annex II [Part 145] contains and error.	Paragraph as referenced does not exist. No text changed.
145.A.70(a) (1)	Aerospace Industries Association	170	Revise as follows (1) A statement signed by the accountable manager confirming that the <u>maintenance</u> organisation exposition and any referenced associated manuals define the organisation’s compliance with this Part and will be complied with at all times. When the accountable manager is not the (chief executive officer) highest officer of the maintenance organisation then such chief executive highest officer shall countersign the statement.	The requirement that the “chief executive officer of the organization” countersign with the accountable manager “when the accountable manager is not the chief executive officer” can be interpreted that such a signature must go up a corporate chain to the highest level. The signer needs to be the highest responsible party within the maintenance organization rather than the possible interpretation of a CEO remote from the operations.	Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.70(a) (13)	GAMTA	151	Recommended Change: Amend paragraph (a)(13) to read: a list of commercial operators, where applicable, to which the organization provides an aircraft maintenance service;	Paragraph (a) (13). The burden of paragraph (a)(13) to list EVERY operator essentially requires a general aviation maintenance organization to list and receive approval of every customer since each general aviation aircraft is operated independently. The original language of JAR 145 required the listing of JAR-OPS operators. This intent should transfer to EASA 145 and require only the listing of commercial operators.	Text changed.
145.A.75	LBA	053	Change "exposition" in "maintenance organisation exposition" to get a clear understanding which exposition should be used.		This requirement is applicable to Part-145 and to prevent adding extra text it was deemed that no further clarification was necessary. No text change.
145.A.75	DGAC, France	162	I – Add at the beginning: " <u>Subject to compliance with paragraph (g)</u> ", and add a paragraph (g) as follows: " <u>(g) the organisation may exercise the privileges of paragraph (a) provided it remains in compliance with this Part, particularly the provisions related to the handling of findings as specified under M.B.605.</u> " II – Add a new paragraph (f) and a new appendix VI as follows: " <u>(f) 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 VI, an approved maintenance organisation may, as identified in the maintenance organisation manual and in conformity with maintenance data:</u> <u>i. fabricate for the use in the course of undergoing work within its own facilities,</u> <u>ii. reproduce a restricted range of parts to replace unserviceable or unsalvageable parts provided by a custom</u> "	I – See comment to M.A.615 II - transfer of 145.A.42(c) provisions and coherence with M.A.603 (See comment to M.A.603)	There is no new paragraph (f) needed as the maintenance organisation is not permitted to issue release certificates under Part-21.A.307 therefore this is not deemed to constitute a derogation. Proposed paragraph (g) is already covered in 145.A.90. No text changed.
145.A.75	DGAC, France	162	In paragraph 145.A.75, add a new paragraph (f) <u>(f) The "Limited Aircraft or Component Maintenance Organisation" shall issue PART145 conformity certificates and not certificate of release to service.</u>	Refer to 145.A.30 reason	Outside the scope of the existing JAR 145 rule. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.75 (a)	LBA	053	A privilege for training of Part 66 category A personnel including preparation of issuance and renewal of aircraft maintenance licences should be added, because it is mentioned in Part 66.A.45(a), 66.B.105 and 66.B.120.	The AMC shall require that the Part145 organisation should fulfil the requirements of Part 147 for the training of category A maintenance personnel.	The training of category A personnel is not deemed to be covered as a Part-145 privilege. No text changed.
145.A.75 (a)	LBA	053	Change “exposition” in “maintenance organisation exposition” to get a clear understanding which exposition should be used.		Text changed but not as proposed.
145.A.75 (b)	LBA	053	1. AMC material is needed to specify under which conditions sub-contracting is allowable. 2. The decision for aircraft shall be made by the operator in accordance with JAR-OPS 3. If the competent authority shall not have the possibility to limit the subcontracting on a case by case basis, the upper limit for subcontracting should be reduced to a lower level..		Refer to AMC. No text changed.
145.A.75 (d)	LBA	053	add "any" in front of component		Proposal not consistent with existing text. No text changed.
145.A.80	European Regional Airlines Assoc. (ERA)	079	This paragraph requires that all facilities, equipment, tooling, material etc. are available when performing maintenance.	Can the Agency advise how temporary non-availability of any or all of these items affects the approval of an organisation?	Existing JAR 145 text. AMC clarifies this issue. No text changed.
145.A.80	DGAC, France	162	“The organisation shall only maintain <u>perform maintenance tasks on an aircraft or component for which it is approved when after having verified the actual availability of all the necessary facilities, equipment, tooling, material, maintenance data and certifying staff are available</u> <u>Where a large PART145 organisation may temporarily not hold some necessary basic means (tools, equipment,..) for an aircraft type or variant specified in the organisation's approval, the maintenance organisation has not to send an application to the state member administration in order to amend the approval certificate on the basis that it is a temporary situation and there is a commitment from the organisation to re-acquire the missing means before maintenance on the type may recommence.”</u>	<b>Implementation problem</b> The current requirement paragraph is a restricted copy of the JAR 145.80, which specifies that a maintenance organisation can only conduct maintenance work on an aircraft or component (or which it holds an approval) when all the necessary means are effectively available. This requirement, without any appropriate and explicit note, could be confusing and misinterpreted. It could make accountable managers believe that a maintenance organisation could be accredited without permanent availability of all the necessary means for their scope of activities, as long as the organisation holds them all temporarily during the maintenance work period. This requirement should state that it is the maintenance organisation final responsibility to verify the availability of the means before performing a maintenance tasks. The meaning of the IEM 145.80 of the JAR145 should also be included in this requirement for	Existing JAR 145 text. AMC clarifies this issue. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				large organisation which could be temporarily limited in its scope of activity due to non-av	
145.A.85	European Regional Airlines Assoc. (ERA)	079	This paragraph requires that the competent authority be notified of changes in facilities, equipment, tooling, material etc.	Can the Agency advise how temporary non-availability of any or all of these items affects the approval of an organisation and would the Agency genuinely wish to be notified of all such changes?	No text change proposal given-this subject is dealt with in Section B. No text changed.
145.A.85	GAMTA	151	Recommended Change: Add a paragraph (b) which reads: "The competent authority may prescribe the conditions under which the maintenance organization may operate during changes unless the competent authority determines that the approval should be suspended."	Section 145.A.85 does not contain procedures for operating while changes to the organization are being processed and approved by the competent authority. In essence, as written, a maintenance organization is not authorized to operate while changes to an approved organization are being processed, evaluated and approved. JAR 145 contained transition language.	No text change proposal given-this subject is dealt with in Section B. No text changed.
145.A.85	Aircraft Electronics Association (AEA)	092	Recommended Change: Add a paragraph (b) which reads: "The competent authority may prescribe the conditions under which the maintenance organization may operate during changes unless the competent authority determines that the approval should be suspended."	Section 145.A.85 does not contain procedures for operating while changes to the organization are being processed and approved by the competent authority. In essence, as written, a maintenance organization is not authorized to operate while changes to an approved organization are being processed, evaluated and approved. JAR 145 contained transition language which should be	No text change proposal given-this subject is dealt with in Section B. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.A.90	CAA, UK	123	The requirement for the payment of charges to be considered as part of continued validity is not included. The CAA see payment of charges as a means to control an approval and an additional tool in recovering its costs by being able to suspend an approval if charges are not paid.		Cost recovery is not an aspect that is covered by Part-145. No text changed.
145.A.90	DGAC, France	162	Amend the text as follows and transfer paragraphs (1) and (2) in section B as conditions for suspension "An approval shall remain valid <u>until</u> surrendered, <u>superseded, revoked, suspended or expired.</u> "	<u>Impracticable</u> See comment to M.A.618 See comment on 145.B.36	Additional conditions as specified are Authority actions and are already covered in 145.B.36. No text changed.
145.A.90	ENAC, Italy	102	In 145.A.90 a flexibility provision should be added to limit duration of approvals granted by the competent Authority for specific cases (for example in case of initial approvals or in critical conditions).		Approvals can only be issued for an "indefinite" period, there is no provision for a limited certificate. No text changed.
145.A.90 (1)	Maintenance Division JAA	012	Does not include organisations responsibilities for closure of findings. <i>Organisation/Legal person</i>		AMC to be produced to explain organisation responsibilities regarding findings.
145.A.90 (3)	LBA	053	Add "or revoked" behind surrendered.		Additional conditions as specified are authority actions and already covered in 145.B.36. No text changed.
145.A.95	Air France	86	Add following text outlined in JAR 145.95 (a) The JAA full member Authority may exempt an organisation from a requirement in JAR-145 when satisfied that a situation exists not envisaged by a JAR-145 requirement and subject to compliance with any supplementary condition(s) said Authority considers necessary to ensure equivalent safety. Such supplementary condition(s) must be agreed by the JAA full member Authorities to ensure continued recognition of the approval. (b) The JAA full member Authority may exempt an organisation from a requirement in JAR-145 on an individual case by case permission basis only subject to compliance with any supplementary condition(s) said Authority considers necessary to ensure equivalent safety.	Miss of flexibility in the management of the organization in case of " urgent maintenance circumstances or needs" . Maintain JAR 145.95 and JAR OPS 1.935 existing flexibilities	Equivalent safety is already covered in Article 10 of Regulation (EC) No 1592/2001 .
145.B all paragraphs	LBA	053	1. Use for Section A and Section B the same structure for the paragraphs.2. Use in all paragraphs "Part-145" or "Part 145", do not mix.		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.10 (1)	CAA, UK	123	There is an inconsistency in be regarding the usage of Member State and Competent Authority with both forms of address being used.		Text changed in 145.B.17. No text changed.
145.B.10 (3)	DLH Germany	021	All staff involved in Part-145 approvals must:.... c) be trained as professional auditors according to EN ISO 19011 d) be trained in Human Factors according to Part-66		The requirement details a generic training requirement and it is not deemed appropriate to be too restrictive regarding the training requirements in this case. No text changed.
145.B.10 (3)	CAA, UK	123	Change 'all necessary' to 'sufficient' knowledge for consistency with Part21.		Necessary is a more appropriate term within the EU framework in this instance. No text changed.
145.B.10 (3)	BDLI	148	All staff involved in Part-145 approvals must:..... c) be trained as professional auditors according to EN ISO 19011		The requirement details a generic training requirement and it is not deemed appropriate to be too restrictive regarding the training requirements in this case. No text change.
145.B.10 (3)	Lufthansa Technik	025	All staff involved in Part-145 approvals must:.. c) be trained as professional auditors according to EN ISO 19011.....		The requirement details a generic training requirement and it is not deemed appropriate to be too restrictive regarding the training requirements in this case. No text changed.
145.B.15	BDLI	148	Where maintenance facilities are located in more than one Member State the investigation and continued oversight 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 surveillance of one maintenance organisation with several line stations by different Member States.	Transferred from existing JAR 145 chapters for multiple site activity. This is also covered in Article 2 of Regulation (EC) No 1592/2002. No text changed.
145.B.15	DGAC, France	162	Propose to delete paragraph	<u>Impracticable</u> See comment to M.A.601	Transferred from existing JAR 145 chapters for multiple site activity. This is also covered in Article 2 of Regulation (EC) No 1592/2002. No text changed.
145.B.15	DLH Germany	021	Where maintenance facilities are located in more than one Member State the investigation and continued oversight 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 surveillance of one maintenance organisation with several line stations (in Lufthansa's case it's more than 100 !) by different Member States.	Transferred from existing JAR 145 chapters for multiple site activity. This is also covered in Article 2 of Regulation (EC) No 1592/2002. No text changed.
145.B.15	Lufthansa Technik	025	Where maintenance facilities are located in more than one Member State the investigation and continued oversight shall be carried out by that Member State, in which the major activities of the organisation concerned take place.	Argument: It is unpractical to perform the surveillance of one maintenance organisation with several line stations by different Member States.	Transferred from existing JAR 145 chapters for multiple site activity. This is also covered in Article 2 of Regulation (EC) No 1592/2002. No text changed.
145.B.15	CAA, UK	123	Review 'Application' title. Does not appear relevant to rule. The content of the rule suggests the title should read 'Organisation with facilities in more than one state'		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.20	DGAC, France	162	Change paragraph (3) in 145.B.20 as follows: "3) The competent authority shall carry out an audit of the organisation to establish compliance with the requirements of Part-145, <u>except for the PART 145.30 (g), (h) &amp; (i) and PART145.50 (a) to (f) for "Limited Maintenance Organisation"</u>	Refer to 145.A.30 reason.	There is no specific category of limited maintenance organisation within Part-145. No text changed.
145.B.20 (1)	FOCA Switzerland	029	Reference should read: 145.A.30(b)(2) [instead of 145.A.30 2)]		Text changed.
145.B.20 (1)	European Regional Airlines Assoc. (ERA)	079	This paragraph makes reference to paragraphs 145.A.30 2).	The referenced paragraph does not appear in Part 145.	Text changed.
145.B.20 (1)	LBA	053	Change twice the reference "145.A.30 2)" to "145.A.20(b)"	Use same structure for the paragraphs in Section B as in Section A.	Text changed.
145.B.20 (1)	CAA, UK	123	Cross reference to 145.A.30 2) should be 145.A.30.(b) (3)		Text changed.
145.B.20 (1)	DGAC, France	162	Propose to delete paragraph	<b>Administrative procedures simplification</b> 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 145.A.30 are complied with. In addition according 145.A.85, the authority has to be informed of any change of these personnel. See also comment to M.B.602	This was an existing JAR 145 procedure. No text changed.
145.B.20 (2)	LBA	053	Change "exposition" in "maintenance organisation exposition"	It is necessary to use the full wording to get a clear understanding lwhich exposition should be used.	This requirement deals only with Part-145 and it is not deemed necessary to further expand the title of the exposition. No text changed.
145.B.20 (7)	European Regional Airlines Assoc. (ERA)	079	The words "to findings" in line one are superfluous as, in paragraph 145.B.20 5) the term "closure actions" are defined in parentheses.		Text changed.
145.B.20 (7)	CAA, UK	123	All findings should be ' <b>corrected</b> ' by the organisation and accepted by the competent authority before the approval is issued		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.25	A. Kalshoven, Central JAA	30	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 Appr		Text changed.
145.B.25	DGAC, France	162	In 145.B.25 Issue of approval, add a new paragraph (4): <u>4) For the Limited maintenance organisation, "Form 3 limited" shall be used in order to precise that the "the Member state certifies, (name of company), as a Part 145 Limited maintenance organisation approved to maintain the products listed in the attached approval schedule and issue related Certificate of conformity using the above reference".</u>	Refer to 145.A.30 reason.	There is no specific category of limited maintenance organisation within Part-145. No text changed.
145.B.25 (2)	Austro Control, Austria	081	The text should read: "... indicate the conditions of the approval..."	Inconsistence: 145.A 90 reads unlimited duration but 145.B.25 requests a validity	Text changed.
145.B.30	British Airways Maintenance Cardiff	097	Para 4 indicates that all level 1 findings must be 'closed to permit the authority to recommend continued approval.	Presently timescales exist are available to allow some flexibility in this area.	There is no flexibility provision for level 1 findings. No text changed.
145.B.30	Aerospace Industries Association	170	Add a subsection (6) as follows: (6) Notwithstanding subsections 4) and 5) above, a maintenance organization may continue to operate as certificated entity while level 1 and 2 findings are in the process of being corrected, provided that the product delivered can be demonstrated to be airworthy and not hazard the aircraft.	Over-inspection and other techniques can be used to deliver product while corrective actions are undertaken.	There is no flexibility provision for level 1 findings, however flexibility is possible via the existing paragraph 5 text for level 2 findings. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.30	Aerospace Industries Association (AIA)	084	Add a subsection (6) as follows: (6) Notwithstanding subsections 4) and 5) above, a maintenance organization may continue to operate as certificated entity while level 1 and 2 findings are in the process of being corrected, provided that the product delivered can be demonstrated to be airworthy and not hazard the aircraft.	Over-inspection and other techniques can be used to deliver product while corrective actions are undertaken.	There is no flexibility provision for level 1 findings, however flexibility is possible via the existing paragraph 5 text for level 2 findings. No text changed.
145.B.30	Mike Newman	040	(2) & (3) Compliance Review and accountable manager meeting. Both to be held every 24 months. This will require a considerable increase in Competent Authority manpower that is required by the Authority to be adequately trained, to carry out their tasks. This will have a huge financial impact on each and every operator and the Maintenance Organisation.	We suggest that 24 months be stretched to 36 months to allow some flexibility. Some Organisations may require 24-month inspections; others perhaps could be looked at every 36 months if they are perceived to be operating correctly. The Competent Authority has plenty of feed back on which to make a decision.	This was the existing text transferred from the JAA Maintenance chapters. No text changed.
145.B.30	CAA, UK	123	The objective of the continued surveillance should be stated, i.e. verification that the MO remains in compliance with Part 145, operates iaw the MOE, and to monitor by sample the standards of the aircraft or component being maintained.		It is felt that the existing text gives sufficient general clarity to this issue. No text changed.
145.B.30 (4-5)	IVW, The Netherlands	099	CAA-NL suggests to delete these two paragraph's, as an approval has an unlimited validity, these recommendation are unnecessary and useless.		Text changed.
145.B.30 (2)	CAA, UK	123	Change 'periods' to read 'intervals'		Not justified. No text changed.
145.B.30 (2)	DAC, Luxembourg	129	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.		Unfortunately it is not possible to determine which two elements are being discussed-the term "both" does not give sufficient clarity. No text changed.
145.B.30 (4+ 5)	LBA	053	The following wording may be better "The Part 145 approval will be continued..."	The wording should be changed, because a recommendation is not necessary when the certificate is unlimited.	Text changed but not as proposed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.35	European Regional Airlines Assoc. (ERA)	079	This paragraph makes reference to paragraphs 145.A.85 1).		Text changed to refer to 145.A.85(a).
145.B.35	LBA	053	The reference "145.A.85, 1)" shall be changed to "145.A.85(a)"	Use same structure for the paragraphs in Section B as in Section A.	Text changed to refer to 145.A.85(a).
145.B.35 (1)	CAA, UK	123	Change to read "Amendments to the exposition shall be evaluated and approved..."		This is already implied within the text. No text changed.
145.B.36	DGAC, France	162	The competent authority <u>may</u> suspend, revoke or limit an approval <u>if</u> (1) the organisation is not able to ensure compliance with Part 145; or (2) the organisation does not remain in compliance with the conditions of approval, in particular the provisions included in the maintenance organisation manual; or (3) the organisation has gone beyond its scope of approval; or (4) the competent authority has not been granted access to the organisation to determine continued compliance with Part 145."	<u>Impracticable:</u> It is not appropriate to render a sanction mandatory. The regulation just needs to specify the administrative sanctions which may be taken by the authority and in what circumstances.	In certain safety-related cases the sanctions must be made mandatory. No text changed.
145.B.36	Aerospace Industries Association	170	Revise first sentence as follows: The competent authority <del>shall</del> <u>may</u> at its sole discretion	there should be some discretion given to the competent authority to determine the severity of the safety threat.	In certain safety-related cases the sanctions must be made mandatory. No text changed.
145.B.36	Aerospace Industries Association (AIA)	084	Competent authority <del>shall</del> <u>may</u> at its sole discretion.	there should be some discretion given to the competent authority to determine the severity of the safety threat.	In certain safety-related cases the sanctions must be made mandatory. No text changed.
145.B.36 (a)	Aerospace Industries Association	170	An objective standard, either a definition or guidance material, as to what criteria constitute a "potential safety threat" is necessary and should be added.		There is an element of judgement when determining a finding and assessing its safety impact. No text changed.
145.B.36 (a)	Aerospace Industries Association (AIA)	084	An objective standard, either a definition or guidance material, as to what criteria constitute a "potential safety threat" is necessary and should be added.		There is an element of judgement when determining a finding and assessing its safety impact. No text change.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.40	Zodiac Group, France	033	To harmonize the findings definitions between Part 21 and Part 145, the 3 levels of findings proposed on 21A.158 must be implemented also on Part 145. Today : Part 21 (3 levels) / Part 145 (2 levels)	For the consistency between Part 21 and Part 145	The various Parts have different requirements, which necessitates different definitions for finding levels. No text changed.
145.B.40	BDLI	148	Add: 4.) Level 3 finding - definition according to JAR-145 -	Level 3 findings and corresponding recommendations proved to be a very helpful tool for the aerospace community to increase safety margins. It also helps to adjust the scale of serious findings. This should not be given up.	Level 3 finding from JAR 145 is dealt with in the AMC, a level 3 finding does not place an obligation on the competent authority to take any action. No text changed.
145.B.40	DGAC, France	162	<p>"When during audits or by other means evidence is found showing non-compliance of the approved organisation with the requirements of Part-145, any finding must be classified as follows:</p> <p>1) Level 1 finding A level 1 finding means any significant non-compliance with the Part-145 which lowers the maintenance standard and hazards an aircraft. It includes non-compliance on aircraft components.</p> <p>2) Level 2 finding A level 2 finding means any non-compliance with Part-145 which could lower the maintenance standard and possibly hazard an aircraft. It also includes non-compliance on aircraft components.</p> <p><u>(b) The competent authority shall confirm the findings in writing</u> <u>(1) within 3 working days for a level one finding</u> <u>(2) within 14 working days for a level two finding.</u> <u>(c) The competent authority shall ensure that the non compliance is corrected by the organisation within a period appropriate to the nature of the finding:</u> <u>1- For level 1 finding, corrective action shall be required immediately.</u> <u>2- For level 2 findings, th</u></p>	<p><u>Imp practicable</u> - An automatic link between a level 1 finding and suspension of the approval may incite inspectors to only declare level 2 findings. - As there is in the legal system a separation between police findings and justice punishment decisions, there should be at the administrative level a separation between inspectors findings and authority's suspension decision. The audit 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 immediately suspend an approval, but it is possible to initiate the procedure (the</p>	Level 1 findings and the actions required are defined in the rule and therefore should not be re-graded as level 2 findings. A level 1 finding is determined as a significant non compliance that hazards an aircraft. The auditing staff is to be trained in accordance with 145.B.10 and should be in a position to make the correct determination of level. Based upon such determination of level the competent authority should support the decisions made by their qualified audit staff in order to process any potential safety related findings rather than "re-grading" the finding. No text changed.
145.B.40	DLH Germany	021	Add: 4.) Level 3 finding - definition according to JAR-145 -	Level 3 findings and corresponding recommendations proved to be a very helpful tool for the aerospace community to increase safety margins. It also helps to adjust the scale of serious findings. This should not be given up.	Level 3 finding from JAR 145 is dealt with in the AMC, a level 3 finding does not place an obligation on the competent authority to take any action. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.40	Lufthansa Technik	25	Add: 4.) Level 3 finding - definition according to JAR-145 -	Argument: Level 3 findings and corresponding recommendations proved to be a very helpful tool for the aerospace community to increase safety margins. It also helps to adjust the scale of serious findings. This should not be given up.	Level 3 finding from JAR 145 is dealt with in the AMC, a level 3 finding does not place an obligation on the competent authority to take any action. No text changed.
145.B.40 (2)	Aerospace Industries Association	170	The organisation approval <del>must</del> <u>may at sole discretion of the competent authority</u> be revoked or suspended in whole or in part depending upon the extent of the level 1 finding until successful corrective action has been taken.	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 changed.
145.B.40 (2)	Aerospace Industries Association (AIA)	084	Revise as follows: The organisation approval must may at sole discretion of the competent authority be revoked or suspended in whole or in part depending upon the extent of the level 1 finding until successful corrective action has been taken.	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 changed.
145.B.40 (2) (4)	LBA	053	The definitions of levels are not in compliance with Part M. The definitions of Part M shall be used for Part 145, too. The definitions of Part M contain the possibility to limit the approval		Definitions are fundamentally the same. In addition 145.B.50 does give as an authority action the possibility to limit the approval. No text change.
145.B.40 (4)	European Regional Airlines Assoc. (ERA)	079	The word "the" needs to be inserted between the words "within" and "time" on the last line of this paragraph.		Text changed.
145.B.55 (2) (a)	IVW, The Netherlands	099	Editorial: CAA-NL suggests to delete the word renewal, since all approvals will be granted without a time limit.		Text changed.
145.B.55 (2) (a)	LBA	053	The word "renewal" shall be deleted.	All certificates are unlimited now.	Text changed.
145.B.55 (2) (h)	LBA	053	add behind "h)" "maintenance"	The right wording is "maintenance organisation exposition"	Text changed.
145.B.55 (2) (h)	CAA, UK	123	It is a copy of the MOE approval that should be retained as part of the records and not the MOE itself (there will be a huge amount of supeseded expositions held as it is currently worded).		MOEs form part of the official records and are required to be kept for 4 years as detailed in paragraphs 2 and 3 in order to reconstruct history should the need arise. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
145.B.55 (3)	Aerospace Industries Association (AIA)	084	Revise as follows: 3) The minimum retention period for the above records shall be four years.	To maintain consistency between the various competent authorities and assure consistent treatment for authorized maintenance organizations, wherever located, the retention period should be constant. Further, 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 maintenance organization. We recommend that the stated retention period be used for that purpose.	The minimum requirement is 4 years otherwise by exclusion one cannot retain documents for more than 4 years. No text changed.
145.B.55 (3)	Aerospace Industries Association	170	The minimum retention period for the above records shall be four years.	To maintain consistency between the various competent authorities and assure consistent treatment for authorized maintenance organizations, wherever located, the retention period should be constant.  Further, 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 maintenance organization. We recommend that the stated retention period be used for that purpose.	The minimum requirement is 4 years otherwise by exclusion one cannot retain documents for more than 4 years. No text changed.
Appendices	CAA, UK	123	All appendices are written using the word 'should'. This implies they are non mandatory and, as the appendices are part of the rule, they should use 'shall'		Text changed.
Appendix I	LBA	053	1. Both descriptions of the "EASA Form One" shall be harmonised in Part M and Part 145 2.		Part-M will be changed to harmonise.
Appendix I	LBA	053	In the description of Block 2 use "EASA Form One"		Text changed but not as proposed.
Appendix I	LBA	053	3. Block 9 shall be deleted, because it has no use for the customer.		This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.
Appendix I	LBA	053	4. The reference in Block 12 "IR-21" shall be changed to "Part 21"		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix I	ENAC, Italy	119	<p>Instructions for completion of EASA Form One are attached to the Parts M &amp; 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.</p> <p>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&amp;GM material.</p> <p>NOTE: consistency with the mandatory instructions of the other Part 21 forms (eg EASA form 52) should be ensured.</p>		<p>The intent is to make the Form 1 completion procedures rule material not only the format of the Form 1. No text changed.</p>
Appendix I	CAA, UK	123	Front of EASA Form, note at bottom right refers to 'dat' not 'data' as it should		Text changed.
Appendix I	CAA, UK	123	Reverse of EASA Form One and Section 2 at top right hand side both refer to JAR 145		Text changed.
Appendix I	CAA, UK	123	Use of Form 1 should not be rule material. It should be removed to the AMC		<p>This would lead to possible de-standardisation within the community and also with in the "enlarged community" following accession various forms could be used to indicate serviceable releases it is therefore deemed appropriate to enforce the use of the Form 1. No text change.</p>
Appendix I	IVW, The Netherlands	099	<p>Instructions on Block 13 of form One: CAA-NL suggests to change the following sentence "Identity of national regulation if not Part 145" into "<b>Identity of other regulation if not Part 145</b>" 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".</p>		Text changed.
Appendix I 2 Block 11	Rolls Royce, Germany	065	<p>"Batch Number" may be deleted because maintenance is not done on batches of parts and "N/a" may also be deleted because a S/N is the only possibility to establish correlation between one individual part and the CRS. With an entry "N/A" this certificate may be attached to every</p>		<p>This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.</p>

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			part with the same part number and is nearly impossible to be detected.		
Appendix I 2 Block 22	Zodiac Group, France	033	“Block 22 : the printed name of the block 20 signatory. <b><u>It is permissible to indicate the personal authorisation reference</u></b> ”	In comparison with the FAR 145, the personal authorization reference is not required.	This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.
Appendix I 1	Aerospace Industries Association (AIA)	084	<b>(Paragraphs 4 &amp; 5)</b> 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.		Language forms part of the Commission Regulation on continuing airworthiness and in the Community system the usage of all of the Official languages is permissible. It is not possible in the EU system to "rule" that the form is completed in English. No text changed.
Appendix I 1	Rolls Royce, Germany	065	To establish the correlation between a part and the related		Comment text not sufficient to determine subject matter. No text changed.
Appendix I 2 Block 8	Aerospace Industries Association (AIA)	084	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-existing text. No text changed.
Appendix I 2 Block 9	Zodiac Group, France	033	To remove the block 9 : Eligibility (on the form and in the text)	This block is not used and not useful by the industry.	This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix I 2 Block 9(c)	Rolls Royce, Germany	065	Unknown” should be deleted because it states that it might be a non-aviation application and than an EASA-Form-One should be issued. “Various” is sufficient when the part is eligible for use on different products.		This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text change.
Appendix I 2 Block12 (4)	Aerospace Industries Association (AIA)	084	Revise as follows: 4 ‘REPAIRED’ The restoration of an item, or specific repair(s) of an item, to a serviceable condition in conformity with an approved standard (*). 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.		This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.
Appendix I, 1.	Aerospace Industries Association	170	<b>(Paragraphs 4 &amp; 5)</b> 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.		Language forms part of the Commission Regulation on the continuing airworthiness and in the Community system the usage of all of the Official languages is permissible .It is not possible in the EU system to "rule" that the form is completed in English. No text changed.
Appendix I, 2. Block 12 4.	Aerospace Industries Association	170	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 a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix I, 2. Block 13	Aerospace Industries Association	170	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. Release statements to satisfy international bilateral agreements.</i> <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 supersede the applicable parts of the implementing rule, however the acceptance of equivalent release documentation completed in accordance with a bilateral is defined in the AMC to 145.A.42. This has the advantage of negating the need to amend the rule each time a new bilateral is agreed, the acceptance of such bilateral parties release certification can be detailed in the AMC. No text changed.
Appendix I, 2. Block 8	Aerospace Industries Association	170	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-existing text. No text changed.
Appendix I, 2. Block 12(*)	Rolls Royce, Germany	065	Delete "manufacturing/design" because "manufacturing or design standards" are not intended to be used for maintenance and therefore this are no approved maintenance data (Ref.145.A.45).		This is a harmonised form recognised throughout industry and to change the Form 1 is a subject that lies outside the current scope of this consultation. No text change.
Appendix I, 2. Block 13	Aerospace Industries Association (AIA)	084	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 supersede the applicable parts of the implementing rule, however the acceptance of equivalent release documentation completed in accordance with a bilateral is defined in the AMC to 145.A.42. This has the advantage of negating the need to amend the rule each time a new bilateral is agreed, the acceptance of such bilateral parties release certification can be detailed in the AMC. No text change.
Appendix II	Finnair	072	When a Part-145 certified maintenance organisation with a category B or C rating is working on an engine/APU or a component installed on aircraft will the work be certified using EASA Form One?	Not clear in the text	AMC to 145.A.50(d) to be produced to clarify the ability to use an EASA form 1 to release work on components "on wing" when the organisation is B/C rated. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix II	IVW, The Netherlands	099	JAR 145 Appendix 2, MOE content is not included in Part 145 neither as an appendix, nor in the rule itself. The similar appendices from JAR 21 are incorporated in the relevant paragraphs from Part 21. CAA-NL strongly recommends to incorporate the information of JAR 145 Appendix 2 into Part 145.		JAR 145 appendix 2 is included as AMC to 145.A.70. No text changed.
Appendix II	LBA	053	1. Change in 1. the reference "paragraph 13" to "paragraph 12" 2. Change in 5. and 6. "accepted" in "approved" in accordance with 145.A.70 3. Change in 10. "Table I" to " Table 1"		Text changed but not as proposed.
Appendix II, 1.	CAA, UK	123	Incorrectly refers to paragraph 13, should read paragraph 12.		Text changed.
Appendix II, 12.	Austro Control, Austria	081	The scope of a one man maintenance organisation should be limited to line maintenance.	Maximum of line maintenance should be allowed for a one man organisation.	Existing JAR 145 text transcribed into Part-145. No text changed.
Appendix II, 12.	European Regional Airlines Assoc. (ERA)	079	The first line of this paragraph uses the phrase "An Part 145 approved maintenance organisation". This should be amended to read "A Part 145 approved maintenance organisation". organisation". This should be amended to read "A Part 145 approved maintenance organisation".	This paragraph contains errors.	Text changed.
Appendix II, 12.	CAA, UK	123	Table does not include A4 rating, an area where there are likely to be small organisations.		Text changed.
Appendix II, 5.	European Regional Airlines Assoc. (ERA)	079	The sixth line of this paragraph uses the phrase "An Part 145 approved maintenance organisation". This should be amended to read "A Part 145 approved maintenance organisation".	This paragraph contains errors.	Text changed.
Appendix II, 6.	European Regional Airlines Assoc. (ERA)	079	The fourth line of this paragraph uses the phrase "An Part 145 approved maintenance organisation". This should be amended to read "A Part 145 approved maintenance organisation".	This paragraph contains errors.	Text changed.
Appendix II, 7.	European Regional Airlines Assoc. (ERA)	079	The third and fourth lines of this paragraph use the phrase "An Part 145 approved maintenance organisation". This should be amended to read "A Part 145 approved maintenance organisation".	This paragraph contains errors.	Text changed.
Appendix II, 8.	European Regional Airlines Assoc. (ERA)	079	The first line of this paragraph uses the phrase "An Part 145 approved maintenance organisation". This should be amended to read "A Part 145 approved maintenance organisation".	This paragraph contains errors.	Text changed.
Appendix II, Table 1	European Regional Airlines Assoc. (ERA)	079	The fourth row of this table makes reference to "A4 Aircraft other than A1, A2 and A3". I believe this should be amended to read "A1, A2 and A3".		Text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix II, Table 1.	CAA, UK	123	Table 1 needs re-formatting as it has split words, i.e. base & line at the top		Table re-formatted.
Appendix III Page 12-1	European Regional Airlines Assoc. (ERA)	079	The statement "Appendix 3 (continued)" appears at the top left hand side of this page, implying that something should have preceded this page from Appendix 3. However, nothing precedes this page. Can the Agency advise if there is missing text?		Text changed.
Appendix III Page 12-1	European Regional Airlines Assoc. (ERA)	079	A space needs inserting between the "a" and "P" of the phrase "As aPart 145 maintenance..." that appears approximately half way down this page.		Text changed.
Appendix IV	Martinair Maintenance & Engineering	061	Certifying staff working at non JAA/EASA located Line Stations / Conditions for non JAA/EASA bases Part 145 Maintenance Organisations / subcontracted line stations Does this also become applicable to non EU states currently part of JAA but no EU-member (i.e. Swiss based organisations)		See note on consequences of the entry into force of the Commission Regulation on the continuing airworthiness on foreign organisations and personnel.
Appendix IV	LBA	053	The reference to "ATA Specification 104 level 1" shall be deleted	The ATA Specification can not be controlled by the EASA.	Text changed to refer to Part-66 appendix 3.
Appendix IV	DGAC, France	162	Replace the first paragraph by: " Certifying staff in compliance with the following conditions <u>may be exempted</u> , in accordance with article 7.2 of the Regulation, until 28 March 2007 from the provisions of 145.A.30(g) and (h).	See comments on article 7 and 145.A.30(j)	No time limit is specified in the text. No text changed.
Appendix IV 1 (d)	Aerospace Industries Association (AIA)	084	Revise as follows: d. The person should demonstrate 5 years maintenance experience for line maintenance certifying staff and 8 years for base maintenance certifying staff. However, those persons whose authorised tasks do not exceed those of an Part 66 category A certifying staff, need to demonstrate 3 years maintenance experience only. For purposes of this provision, experience includes formal training/education from a recognized training school or university directly related to maintenance.	Education should be counted as experience.	This comment is not aligned with the requirements of Part-66. No text changed.
Appendix IV 1 (e)	Mike Newman	040	Last sentence dealing with part 66 'A' certifying staff; add a new sentence after "type training". "The scope of such task training must be noted on the "A" certifier's licence."		This comment is not aligned with the requirements of Part-66. No text changed.
Appendix IV 2 (f)	Mike Newman	040	Add another sentence after the words "make certification". "However, those certifiers holding B1/B2 approvals working as inspectors or supervisors <u>will be</u> trained to level 3 of ATA 104 so that they may fault find and rectify the		This comment is not aligned with the requirements of Part-66. No text changed.



## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			aircraft/engines to which they are assigned."		
Appendix IV, 1. d.	Aerospace Industries Association	170	Revise as follows: d. The person should demonstrate 5 years maintenance experience for line maintenance certifying staff and 8 years for base maintenance certifying staff. However, those persons whose authorised tasks do not exceed those of an Part 66 category A certifying staff, need to demonstrate 3 years maintenance experience only. For purposes of this provision, experience includes formal <u>training/education from a recognized training school or university directly related to maintenance.</u>	Education should be counted as experience.	This comment is not aligned with the requirements of Part-66. No text changed.
Appendix IV, 2.	ENAC, Italy	102	Appendix IV to Part 145 paragraph 2 "protected rights" should be applicable only to those certifying staff that at the date of the entry into force of Part 66 have a certification authorization issued by a JAR145 A.M.O. approved by a JAA full member.	Personnel qualified in accordance with regulations of countries not JAA full members and not already holding a JAR 145 certification authorization should not have protected right in Part145 environment.  If this is already the intent of the paragraph, then the wording should be clarified because the word "qualified" is usually referred to the licence and not to the certification authorization.	Text changed.
Appendix IV, 2. a.	Aerospace Industries Association	170	This Appendix is intended primarily for certifying staff of non-member states who are not qualified to Part 66 in accordance with Part 145A.30(j) 1 and 2. A grandfathering provision is necessary for those certifying staff in non-member countries currently performing maintenance that has been accepted by the JAA. Subparagraph "a." needs to be expanded to cover these staff.		This paragraph is relevant to authorised personnel. Those organisations in non-EU JAA full member states will be treated as foreign organisation approvals. No text changed.

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix VI,	DGAC, France	162	<p>Maintenance organisation performing manufacturing activity.</p> <p>1 Scope</p> <p>For a maintenance organisation the necessity may arise sometimes to manufacture parts during repair or modification activities. Under certain defined limitations this is permissible only for repairs and modifications without being in conflict with Part 145..</p> <p>Normally the manufacturing of parts by an organisation would require the company to hold a specific approval to do so.</p> <p>For approved maintenance organisations it is also permissible to include fabrication of a restricted range of parts if:</p> <p>a) manufacture, inspection assembly and test are clearly within the technical and procedural capability of the organization;</p> <p>b) all necessary data to manufacture the part is approved either by Agency or the Type Certificate Holder or Design Organisation Approval Holder, or Supplemental Type Certificate Holder;</p> <p>2 Limitations</p> <p>2.1 Items manufactured by an approved maintenance organisation may only be used by that organisation in the course of overhaul, main</p>		<p>This text is already included in the AMC to 145.A.42(c) and is not considered to be rule material.</p> <p>No text changed.</p>

## Part 145 – Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix VI,			<p>Manufacture, the parts may be produced under cover of maintenance organisation Approval. Care must be taken to ensure that the data include details of part numbering, Dimensions, materials, processes, and any special manufacturing techniques, special raw Material specification or/and incoming inspection requirement and that the approved Organisation has the necessary capability. That capability must be defined by way of Maintenance organisation manual content. Where special processes or inspection procedures are defined in the approved data which are not available at the organisation the maintenance organisation can not manufacture the part unless the TC/STC-holder gives an approved alternative.</p> <p>2.5 Examples of manufacture under the scope of a maintenance organisation approval can include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>a) Fabrication of bushes, sleeves and shims.</li> <li>b) Fabrication of secondary structural elements and skin panels.</li> <li>c) Fabrication of control cables.</li> <li>d) Fabrication of flexible and rig</li> </ul>		