

Comment				Comment summary	Suggested resolution	Comment is an observation or is a suggestion*	Comment is substantive or is an objection**	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	Boeing	1.2 Abbreviations	3	Missing two key abbreviations from the list. These terms are used throughout the document without definition	Add the following abbreviations: CS – Certification Specification ICA – Instructions for Continued Airworthiness	S		Agreed	Abbreviations included in the updated Certification Memorandum (section 1.2 / page 3).
2	Boeing	3.8 Checklist	7	Correction to term usage; Aircraft Flight Manual Supplement (FMS). These terms would be consistent with Section 12 Abbreviation List	We recommend revising the text as follows: Aircraft Flight Manual Supplement (AFMS)	S		Agreed	The proposed correction was included in the updated Certification Memorandum (section 3.8 / page 7).
3	Airbus	3.1 Applicability	4	Airbus believes that the sentence under 1 is linked to validation projects only. Airbus suggests to combine the 2 nd and the 3 rd sentences of the paragraph	The methodology given in this guidance applies to all kinds of products and to certification as well as validation projects provided the affected models are included in the validating authority TCDS	S		Agreed	The proposed modification with minor changes is incorporated into the updated Certification Memorandum (section 3.1 / page 4): <i>The methodology given in this guidance applies to all kinds of products and to certification as well as validation projects provided the affected models have been validated by EASA.</i>
4	Airbus	General comment		Airbus considers clarity on how the application for an AML change be distinguished from changes to type certificate limited to a single type? Is there the use of the same application process and forms? Will an AML change be handles as a single change in terms of fees?	A new paragraph could be added to give clarity on the application for an AML change and how the corresponding fees would be calculated.	S		Not pertinent	This request falls outside the scope of the Certification Memorandum as it should be addressed by regular administration procedures or the EASA Charge & Fees regulation. Note: there is no specific form to be used for AML-STCs. The same applications forms are used. For example, an AML-STC application uses the same application forms and process than the “regular” STC approval application. The same applies to the Major or Minor Change applications. Similarly, the fees are applied based on the type of application (STC/Major Change/Minor Change) – the only specific process is that, in case of an AML application, the heaviest aircraft is used to compute the applicable fees.
5	Airbus	3.7 Changes to AML Change	6	Airbus would like to know if the table is intended to document the content of the AML change only, or will it be used to drive the update of all affected TCDS in case of a major AML change? Airbus believes that the Appendix – EASA Approved Model List Template – it could be assumed that a major AML change will drive the TCDS update of multiple type/models.	Add explanation what the data provided in the EASA Approved Model List Template will drive, e.g. update of the TCDS?	S		Agreed	To support the clarifications requested by Airbus the following text was added (section 3.9 / page 7): “The primary purpose of this table is to document the content of the AML change. In some cases (i.e. Major Changes) a TCDS update might be triggered but such update is not required by default. The TCDS reference is included in the table for reference purposes.”

* Please complete this column using the word “yes” or “no”

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