



Comment-Response Document 2014-10

Appendix I

Aircraft type ratings for Part-66 aircraft maintenance licences

CRD to NPA 2014-10 — RMT.0541 — 15.7.2015

Related Decision 2015/020/R

EXECUTIVE SUMMARY

Appendix I 'Aircraft type ratings for Part-66 aircraft maintenance licences' to Annex IV 'Acceptable Means of Compliance to Part-66' to Decision 2003/019/RM ('Part-66 AMC Appendix I') is required to be up to date to serve as a reference for national aviation authorities. 66.B.115 requires that the aircraft type endorsement shall use the appropriate type ratings specified by EASA.

In order to achieve this requirement, the text of Part-66 AMC Appendix I should be amended regularly to include new aircraft type ratings.

The regular amendment of Part-66 AMC Appendix I is considered a permanent rulemaking task for EASA. Appendix I was last amended by Decision 2013/024/R of 10 September 2013.

EASA, pursuant to Article 52(1)(c) of Regulation (EC) No 216/2008 and Articles 5(3) and 6 of the Rulemaking Procedure, has widely consulted interested parties on the matters which are the subject of this rulemaking activity and has provided thereafter a written response to the comments received.

This Comment-Response Document (CRD) contains all the individual comments received on NPA 2014-10 (published on 16 April 2014), as well as the EASA responses thereto.

The resulting rule text is provided in Decision 2015/020/R, which is published in parallel to this CRD on the Agency's website.

Applicability		Process map	
Affected regulations and decisions:	AMC to Part-66	Concept Paper:	No
Affected stakeholders:	National aviations industry authorities;	Terms of Reference:	No
Driver/origin:	Level playing field	Rulemaking group:	No
Reference:	N/A	RIA type:	None
		Technical consultation during NPA drafting:	No
		Publication date of the NPA:	15.4.2014
		Duration of NPA consultation:	3 months
		Review group:	No
		Focussed consultation:	No
		Publication date of the Opinion:	N/A
		Publication date of the Decision:	2015/Q2



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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this CRD in line with Regulation (EC) No 216/2008¹ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the Agency's [Rulemaking Programme for 2014](#), under RMT.0541.

The draft Acceptable Means of Compliance (AMC) have been developed by the Agency. All interested parties were consulted through NPA 2014-10³, which was published on 15 April 2014. 27 comments were received from interested parties, including industry and national aviation authorities.

The text of this CRD has been developed by the Agency.

The process map on the title page contains the major milestones of this rulemaking activity.

1.2. The structure of this CRD and related documents

This CRD contains all the individual comments, and the responses thereto, received on NPA 2014-10. The resulting rule text is provided in Decision 2015/020/R, which is published in parallel to this CRD on the Agency's website at <http://www.easa.europa.eu/document-library/agency-decisions>.

¹ Regulation (EC) No 216/2008 of the European Parliament and of the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1).

² The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision 01-2012 of 13 March 2012 concerning the procedure to be applied by the Agency for the issuing of Opinions, Certification Specifications and Guidance Material (Rulemaking Procedure).

³ <http://easa.europa.eu/system/files/dfu/NPA%202014-10%20Appendix%20-%20Aircraft%20type%20ratings%20for%20P%28RMT.0541%29.pdf>



2. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest the Agency's position. The terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

(General comments)	-
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comment	11	comment by: <i>Swiss International Airlines / Bruno Pfister</i>
	Swiss Intl Air Lines take note of the NPA 2014-10 without further comments.	
response	<i>Noted</i>	
comment	19	comment by: <i>UK CAA</i>
	Please be advised the UK CAA has no comments on NPA 2014-10, Appendix 1 - Aircraft type ratings for Part 66 aircraft maintenance licence.	
response	<i>Noted</i>	
comment	20	comment by: <i>Luftfahrt-Bundesamt</i>
	The LBA has no comments on NPA 2014-10.	
response	<i>Noted</i>	
comment	21	comment by: <i>FNAM-French Aviation Industry Federation</i>
	<p>FNAM (Fédération Nationale de l'Aviation Marchande) is the French National Professional Union / Trade Association for Air Transport, grouping as full-members:</p> <ul style="list-style-type: none"> • CSTA: French Airlines Professional Union (incl. Air France) • GIPAG: French General Aviation Operators Professional Union • SNEH: French Helicopters Operators Professional Union • CSAE: French Handling Operators Professional Union • GPMA: French Ground Operations Operators Professional Union • EBAA France: French Business Airlines Professional Union <p>And as associated members:</p> <ul style="list-style-type: none"> • UAF: French Airports Professional Union <p>The NPA 2014-10 introduces changes in comparison with:</p>	



- The Acceptable Means of Compliance and Guidance Material related to the Commission Regulation (EU) N° 2042/2003 (Annex III (Part-66)).

The comments hereafter shall be considered as an identification of some of the major issues the FNAM asks EASA to discuss with third-parties before any publication of the proposed regulation.

In consequence, the comments hereafter shall not be considered:

- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;

- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;

- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean FNAM has (or may have) no comments about them, neither FNAM accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation.

FNAM thanks EASA to regularly update the list of aircraft Type Ratings (TR) for aircraft maintenance licences.

However, FNAM would like to remind to EASA that these updates should take into consideration the characteristics of each aircraft as it is indicated in Part 66.A.5 "Aircraft groups" to the Commission Regulation (EU) N° 2042/2003:

"For the purpose of ratings on aircraft maintenance licences, aircraft shall be classified in the following groups:

1. Group 1: complex motor-powered aircraft as well as multiple engine helicopters, aeroplanes with maximum certified operating altitude exceeding FL290, aircraft equipped with fly-by-wire systems and other aircraft requiring an aircraft type rating when defined so by the Agency.

2. Group 2: aircraft other than those in Group 1 belonging to the following subgroups:

— sub-group 2a: single turbo-propeller engine aeroplanes

— sub-group 2b: single turbine engine helicopters

— sub-group 2c: single piston engine helicopters.

3. Group 3: piston engine aeroplanes other than those in Group 1."

FNAM noticed some serious issues on this list related to some model of aircraft listed in the Group 1.

In fact, page 18, in the "CESSNA Aircraft Company" TC holder category, the first five models, Cessna 401/402, 404, 411, 414, 421, are belonging to the Group 1.

FNAM doesn't understand why they are placed in this group as they are not turbine equipped aeroplanes, they are normal piston engine aeroplanes. However, the Cessna 340, which is nearly similar to them, is in the group 3.

Thus FNAM is asking to EASA to move the Cessna 401/402, 404, 411, 414, 421 models from Group 1 aeroplanes to Group 3, Piston-engine aeroplanes.

In order to avoid any mistakes related to the model of aircraft in this list, EASA should have the right vision about European General Aviation fleet in order to adapt correctly the regulation to each type of aircraft. To do so, EASA should have a good overview of the following point:

· The number of aircraft registered in Group A, Group 2a, and Group 3,

· The number of Part-145 and Part-M/F related to GA,

· The number of mechanics per type of aircraft requiring a TR for GA, and their ages.

Based on French aeronautical data, FNAM would like to point out that there is a shortage of



	<p>B2 Type Rated mechanics on the market. Airlines, manufacturers and large Part-145 phagocytize the market under pressure. Thus, General Aviation organizations are no more in position to have B2 enough Type Rated mechanics. FNAM is suggesting to EASA that a possible solution to overcome with this difficulty would be the development of System Rating for some General Aviation aircraft (example of aircraft: Piper Meridian, Piper Malibu, Mooney Ovation3).</p> <p>To conclude, the concept of complexity fitting shall be introduced within the Regulation.</p>
response	<p><i>Noted</i></p> <p>The Agency is aware of the understaffing of B2 mechanics in maintenance organisations, especially for General Aviation aircraft. This is the reason why a rulemaking task was launched to evaluate the possibility of a simpler licence for avionics technicians in General Aviation. The result is Opinion 05/2015 'B2L and L Part-66 aircraft maintenance licences' that the Agency published on 22 June 2015 in order to amend Part-66 to propose a B2L licence for avionics certifying staff for all aircraft other than Group 1. This licence is an innovative change as it proposes a licence with 'system ratings' and is better adapted to aircraft used in VFR or non-commercial operations.</p> <p>See also response to comment No 23 from GIPAG, and response to comment No 9.</p>
comment	<p>23 comment by: <i>GIPAG France (French General Aviation Operators Professional Union)</i></p> <p>The NPA 2014-10 introduces changes in comparison with:</p> <ul style="list-style-type: none"> - The Acceptable Means of Compliance and Guidance Material related to the Commission Regulation (EU) N° 2042/2003 (Annex III (Part-66)). <p>The comments hereafter shall be considered as an identification of some of the major issues GIPAG France asks EASA to discuss with third-parties before any publication of the proposed regulation.</p> <p>In consequence, the comments hereafter shall not be considered:</p> <ul style="list-style-type: none"> - As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council; - As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it; - As exhaustive: the fact that some articles (or any part of them) are not commented does not mean GIPAG France has (or may have) no comments about them, neither GIPAG France accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation. <p>GIPAG France thanks EASA to regularly update the list of aircraft Type Ratings (TR) for aircraft maintenance licences.</p> <p>However, GIPAG France would like to remind to EASA that these updates should take into consideration the characteristics of each aircraft as it is indicated in Part 66.A.5 "Aircraft groups" to the Commission Regulation (EU) N° 2042/2003:</p> <p><i>"For the purpose of ratings on aircraft maintenance licences, aircraft shall be classified in the following groups:</i></p> <ol style="list-style-type: none"> <i>1. Group 1: complex motor-powered aircraft as well as multiple engine helicopters, aeroplanes with maximum certified operating altitude exceeding FL290, aircraft equipped with fly-by-wire systems and other aircraft requiring an aircraft type rating when defined so by the Agency.</i> <i>2. Group 2: aircraft other than those in Group 1 belonging to the following subgroups:</i>



- sub-group 2a: single turbo-propeller engine aeroplanes
- sub-group 2b: single turbine engine helicopters
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In order to avoid any mistakes related to the model of aircraft in this list, EASA should have the right vision about European General Aviation fleet in order to adapt correctly the regulation to each type of aircraft. To do so, EASA should have a good overview of the following point:

- The number of aircraft registered in Group A, Group 2a, and Group 3,
- The number of Part-145 and Part-M/F related to GA,
- The number of mechanics per type of aircraft requiring a TR for GA, and their ages.

Based on French aeronautical data, GIPAG France would like to point out that there is a shortage of B2 Type Rated mechanics on the market. Airlines, manufacturers and large Part-145 phagocytize the market under pressure. Thus, General Aviation organizations are no more in position to have B2 enough Type Rated mechanics. GIPAG France is suggesting to EASA that a possible solution to overcome with this difficulty would be the development of System Rating for some General Aviation aircraft (example of aircraft: Piper Meridian, Piper Malibu, Mooney Ovation3).

To conclude, the concept of complexity fitting shall be introduced within the Regulation.

response

Not accepted

The reason of allocation of Cessna 400 Series in Group 1 is that the aircraft meets the definition of Group 1 (maximum altitude exceeds FL290). To exclude Cessna 400 from Group 1, this would require the amendment of Commission Regulation (EU) No 1149/2011 which defines the aircraft groups. A reallocation in Group 3 would require an amendment to Part-66.

To address the concern about the understaffing of B2 personnel, the Agency has included in the Rulemaking Programme a task to amend Part-66 in order to add a B2L licence for General Aviation (more precisely for aircraft other than Group 1) to propose an innovative 'system rating' in addition to aircraft rating. This means that the holder of a B2L licence may be endorsed for example: one or two system rating as 'Nav/com + Surveillance systems' for 'piston engine aeroplanes'. See the Agency's Opinion 05/2015 on B2L and L Part-66 aircraft maintenance licences, published on 22 June 2015.

In addition, the Agency plans to launch another rulemaking task to cover 'legacy aircraft' which are Group 1 and no Part-147 training course is available on the market (task on 'Miscellaneous on Part-66'). The task aims to propose a solution to address the issue.



comment 24

comment by: SVFB/SAMA

2014-12 NPA Aircraft Type Rating for Part 66 AML B2

ECOGAS represents “Small and Medium Enterprises” (**SME**) active in both CAT and non-CAT. SME’s are in a holistic consideration the economical backbone of Europe. Aviation SME’s, a much smaller subgroup have been extremely harmed by regulation adapted to airlines and major organisations without evidence of safety benefits for SME’s.

SME’s are of the opinion that a review of the present system must go well beyond what NPA 2014-10 proposes because it is urgent for survival of SME's. To take in account experience and ideas of SME’s will enhance safety and promote economy at the same time. The following comments identify major issues linked with the principle of aircraft groups and Type Ratings and the referenced aircraft list.

Some or all comments may be used in the Survey of the EU Commission in regards to the Basic Regulation and in the NPA 2014-12. At this stage they are neither complete nor exhaustive.

We propose the following changes in regards to the aircraft list:

In the case of B1: The principle of having groups and type ratings for B1 is supported. However even for B1 a multitude of aircraft should be moved off group 1 into group 2 or in some cases even into group 3 for B1 licenses. The principle of allocation aircraft into the list should be driven by the question: Is this an Airline (Mass CAT) type aircraft?: **yes >Group 1, No > group 2 or 3.** Final allocation will take some time to communicate and should eventually come from affected experienced SME’s. As a matter of fact they have neither time nor money for extensive study in the subject, which makes participation difficult and results doubtful.

In the case of B2: The principle of having groups and type ratings for B2 has not boosted proliferation of avionics staff nor has it boosted safety.

B2 staff aircraft type rating should be changed into aircraft system rating.

B2 aircraft allocation into Group 1 to 3 lacks several components which would justify the present classification of aircraft which are not for mass CAT into group 1. Many arguments point to inappropriate (ungenügend) differentiation:

A risk based approach. All aircraft > above 2T are treated equal instead of differentiation proportionate to potential risk.

Consider damage potential: it is at least linear to MTOW

The competencies of B2 staff based on background and experience must be considered adequately

practical experience of B2 staff to be considered adequately

statistical evidence for SME organisations working on non mass CAT aircraft

proportionate

performance based surveillance. This means staff individuals performance could realistically be judged by the SME organisation itself. The direct link between performance (competence) and achieved result is very obvious.

The argument there is a Part 147 available should not be the decision maker if a TR makes sense or not.

Any solution not considering the well being of SME’s is a potential threat to safety for many reasons.

SME entrepreneurs are first to understand that only correct and safe work will keep their business alive.

The generic principle when revising the list should be:

All twin engine aircraft with reciprocal engines should be moved into group 3

All “analogue” aircraft should be moved off group 1



response

The principle questions to be answered to decide an aircraft belongs in Group 1 should be: does overall complexity, overall integration request that the specific staff B2 needs a type rating on this aircraft in order to be competent on this aircraft ?
The current requirement how to assess the competence is not adapted to SME's.

Not accepted

In the context of this CRD, the Agency can accept comments only in relation to the list of type ratings, and your comment goes beyond the scope of this domain.

However, in relation to the concerns expressed in your comment, please note the following:

B1 licence: The Agency has launched a rulemaking task to cover 'legacy aircraft' which are Group 1 where no Part-147 training course is available on the market (task on 'Miscellaneous on Part-66'). The task aims to consider this issue too.

B2 licence: The Agency has already taken into consideration the issue raised here by including in the Rulemaking Programme in 2010 a task to amend Part-66 in order to add a B2L licence for General Aviation (more precisely for aircraft other than Group 1) to propose an innovative 'system rating' in addition to aircraft rating. This means that the holder of a B2L licence may be endorsed for example: one or two system ratings as 'Nav/com + Surveillance systems' for 'piston engine aeroplanes'. See the Agency's Opinion 05/2015 on B2L and L Part-66 aircraft maintenance licences, published on 22 June 2015.

The comments made on 'inappropriate requirements on basic knowledge and experience' for the B2 licence should be brought to the attention of the SSCC in order to add a task in the Rulemaking Programme to amend the B2 licence. This is not included in the Rulemaking Programme at this stage because it has not been proposed yet.

Regarding your further comments:

- Twin engine aircraft with reciprocating engines: The definition of Group 3 is to include all piston engine aeroplanes whether the engines are reciprocating or not.
- We do not understand the concept of 'analogue' aircraft.
- The criteria on 'type rating for B2' to identify whether an aircraft is in Group 1 or in another group is not appropriate. Currently, B2 staff may be endorsed with an individual type rating for aircraft in Group 1, Group 2 or Group 3.

comment

26

comment by: SVFB/SAMA

	Possible solutions	Remarks	140710-2007
Rating		Pro	Contra
System Rating instead AC Rating	For B2 cancel the Aircraft rating altogether and keep it only for mass CAT aircraft.	One System for all B2 below a sensible limit, e.g. less than 18 Pax.	For mass CAT Aircraft > 18 PAX the B2 TR may be continued, as all systems are very high integrated in those aircraft.
B1/2 AC Rating with	Keep different list of aircraft group which take into account the specific complexity of	This would be possible without change of the BR	More lists



indiv. Lists for B1 and B2	avionic systems and create Group 1 for B1 and new group 1 for B2. Group 1 for B2 would have rating for all aircraft with the same Avionic system.	eventually and could be a quick fix	
AC von G1 in G2 or G3	Move aircraft which can be worked on by a B2 , eventually amended by an experience req. (years , number current systems) could lift all restrictions in the non mass CAT,	Simple justification by an expert	
others			

response *Not accepted*

The concept of ‘system rating’ has been applied to the B2L licence. It might be possible that this would be also applicable to larger aircraft maintained under the current B2 licence, but the Agency needs to launch a rulemaking task, and currently no task is in the plan for this purpose. A request to SSCC is needed for that.

comment 28 comment by: DGAC France

DGAC would recommend EASA not to add a reminder of TCH in Part-66 Type rating endorsement and use the same wording as in the column Type Description of the products certification lists. Moreover, the terms used in Part-66 Type rating endorsement are not always updated and sometimes confusing. For example:
- CEAPR "Robin DR250 series (Lycoming)" or SOCATA "Grumman GA-7 (Lycoming)"
DGAC recommends: CEAPR "DR250 series (Lycoming)" or SOCATA "GA-7 (Lycoming)"
These two lists are complementary. It could also be helpful to have a table which identifies which models of products certification lists are covered by a Part-66 Type rating endorsement. It will simplify the use of these two lists.

response *Not accepted*

It is true that the identification of Group 3 aircraft has to be simple, but currently the reminder of ‘Grumman’ for GA7 or of ‘Robin’ for DR250 is a reminder of the original manufacturer to help in the identification of the type; it is not a reminder of the TC holder who are Socata and CEAPR in our cases. The Agency does not think that by modifying these ratings licensing would be facilitated. Most of these aircraft are endorsed through group ratings.

The identification of the models of products covered by a type rating is already provided in the corresponding TCDS (Socata and CEAPR in these cases). This list aims to provide type ratings for Part-66 AML, but not information already published in the TCDS. It would be impossible to update regularly the required detailed information.

comment 34 comment by: UK CAA



Part-66_Type_Ratings_on_Licences_03_06_2014	
EndorsementText	Count
(Apex) CAP 230 / 231 / 231EX (Lycoming)	1
(MD Helicopters) Helicopters single turbine group rating	1
Aermacchi F260 Series (Lycoming)	2
Aermacchi SF260 (RR Corp 250)	3
Agusta A109 (Turbomeca Arriel 1)	9
Agusta A109 Series (PWC PW206 / 207)	93
Agusta A109 Series (RR Corp 250)	122
Agusta A109 Series (Turbomeca Arrius 2)	6
Agusta A119 / Agusta AW119MkII (PWC PT6)	3
Agusta AB139 / AW139 (PWC PT6)	161
Agusta AB204, AB205 / Bell 204, 205 (Honeywell T53)	65
Agusta AB206 / Bell 206 (RR Corp 250)	159
Agusta AS61N / Sikorsky S-61N (GE CT58)	265
Air Tractor AT-400 / 500 / 800 (PWC PT6)	1
Air Tractor AT-800 Series (PWC PT6)	124
American AA-1A (Lycoming 320)	1
American AG-5B (Lycoming 360)	1
Antonov AN38 (Honeywell TPE331)	1
Aquila AT01 (Rotax)	2
Aviat Husky A (Lycoming)	2
Ayres S2R Series (PWC PT6)	8
B-N Group (Britten Norman) BN2 Islander (Lycoming)	64
BO 105 series (RR Corp 250)	197
Beagle B.121 series 2 / 3 (Lycoming) Does not appear in current annexe I listing	1
Beech 1900 (PWC PT6)	35
Beech 200 Series (PWC PT6)	401
Beech 23 Series (Lycoming)	7
Beech 24 Series (Lycoming)	5
Beech 300 Series (PWC PT6)	160
Beech 33 Series (Continental)	6
Beech 35 Series (Continental)	2
Beech 36 Series (Continental)	7
Beech 390 (Williams FJ44)	80
Beech 400 / Mitsubishi MU-300 (PWC JT15)	109
Beech 55 Series (Continental)	8



Beech 58 Series (Continental)	8		
Beech 58P (Continental)	4		
Beech 76 (Lycoming)	5		
Beech 90 Series (PWC PT6)	310		
Beech 95 Series (Lycoming)	5		
Beech 99 (PW PT6)	12		
Beech 99 / 100 Series (PWC PT6)	183		
Beech A23 (Continental)	5		
Beech B100 (Honeywell TPE331)	109		
Beech B300 (PW PT6)	9		
Bell 206LT (RR Corp 250)	11		
Bell 212 / Agusta AB212 (PWC PT6)	261		
Bell 214 (Honeywell T5508)	63		
Bell 214ST(GE CT7)	76		
Bell 222 (Honeywell LTS 101)	33		
Bell 222 (RR Corp 250)	2		
Bell 230 (RR Corp 250)	1		
Bell 407 (RR Corp 250)	8		
Bell 412 / Agusta AB412 (PWC PT6)	153		
Bell 427 (PWC PW207D)	1		
Bell 429 (PWC PW207D)	7		
Bell 430 (RR Corp 250)	21		
Bell/Agusta/Westland 47 (Lycoming 435)	8		
Bellanca 17-30 / 17-31 Series (Continental)	1		
Bellanca 7 Series (Lycoming)	1		
Boeing 234 (Honeywell 5512)	4		
Brantly B2 (Lycoming)	2		
Britten-Norman BN.2A Mark III (Lycoming)	40		
Britten-Norman BN2A Series (Lycoming)	8		
Britten-Norman BN2B Series (Lycoming)	7		
Britten-Norman BN2T Series (RR Corp 250)	204		
Bölkow BO 209 (Lycoming)	4		
CAP 10 (Lycoming)	3		
CAP 20 / 21 (Lycoming)	1		
CASA C-212 (Honeywell TPE331)	9		
Cessna (Soloy) 206 / 207 (RR Corp 250)	3		
Cessna - aeroplane single piston engine - metal structure (Reference Part-	2		



66.A.45(g))			
Cessna / Reims-Cessna 150 / F150 Series (Continental)	165		
Cessna / Reims-Cessna 152 / F152 Series (Lycoming)	160		
Cessna / Reims-Cessna 172 / F172 Series (Continental)	144		
Cessna / Reims-Cessna 172 / F172 Series (Lycoming)	149		
Cessna / Reims-Cessna 182 / F182 Series (Continental)	30		
Cessna / Reims-Cessna 182 / F182 Series (Lycoming)	28		
Cessna / Reims-Cessna 182 / F182 Series (SMA)	10		
Cessna / Reims-Cessna 337 Series (Continental) (not pressurised)	13		
Cessna / Reims-Cessna 337 Series (Continental) (pressurised)	8		
Cessna 120 (RR Continental C85)	2		
Cessna 140 Series (RR Continental)	9		
Cessna 170 Series (RR Continental)	12		
Cessna 175 Series (Continental)	126		
Cessna 175 Series (Lycoming)	115		
Cessna 177 Series (Lycoming)	29		
Cessna 180 Series (Continental)	12		
Cessna 185 Series (Continental)	9		
Cessna 195 (Jacobs R-755) Does not appear in current annexe I listing	1		
Cessna 206 Series (Continental)	11		
Cessna 207 Series (Continental)	9		
Cessna 208 Series (PWC PT6)	108		
Cessna 210 Series (Continental)	13		
Cessna 310 / 320 Series (Continental)	9		
Cessna 335 (Continental)	5		
Cessna 336 (Continental)	2		
Cessna 340 (Continental)	6		
Cessna 401 / 402 (Continental)	121		
Cessna 404 (Continental)	120		
Cessna 411 (Continental)	105		
Cessna 414 (Continental)	106		
Cessna 421 (Continental)	195		
Cessna 425 (PWC PT6)	215		
Cessna 441 (Honeywell TPE331)	183		
Cessna 500 (PWC JT15D)	108		
Cessna 500 / 501 (PWC JT15D)	81		
Cessna 500/501 (PW JT15D)	16		



Cessna 501 (Sierra) (Williams FJ 44)	3		
Cessna 501 / 551 (PWC JT15D)	98		
Cessna 510 (PWC PW615)	22		
Cessna 525 (Will FJ 44)	6		
Cessna 525 / 525A (Williams FJ 44)	88		
Cessna 525B (Williams FJ 44)	45		
Cessna 525C (Williams FJ 44)	1		
Cessna 550 / 551 / 560 (PWC JT15D)	154		
Cessna 550 / 560 (PWC PW530 / 535)	102		
Cessna 560XL / XLS (PWC PW545)	108		
Cessna 650 (Honeywell TFE731)	46		
Cessna 680 (PWC PW306)	17		
Cessna 750 (RR Corp AE3007C)	15		
Cessna P210N (RR Continental TSIO-520) Does not appear in current annexe I listing	4		
Cessna T303 (Continental)	6		
Cessna/Reims-Cessna 172/F172 Series (Thielert)	95		
Champion 7 Series (Continental) Does not appear in current annexe I listing	2		
Champion 8 Series (Lycoming)	2		
Cirrus SR20 (Continental)	3		
Cirrus SR20 / SR22 / SR22T Series (Continental)	3		
Cirrus SR22 (Continental)	3		
Commander 112 (Lycoming)	8		
Commander 114 (Lycoming)	8		
Commander 500 Series / 680 Series (Lycoming)	2		
Consolidated PBY-5A (PW R1830)	1		
Convair 580 (RR Corp 501)	2		
De Havilland DHC-2 (PWC PT6)	2		
De Havilland DHC-6 (PWC PT6)	273		
De Havilland DHC-7 (PWC PT6)	60		
Diamond Aircraft Industries - aeroplane multiple piston engine - composite structure	1		
Diamond Aircraft/HOAC - aeroplane single piston engine - composite structure (Reference Part-66.A.45(g))	2		
Diamond DA20 (Continental)	7		
Diamond DA20 / DV20 (Rotax)	5		
Diamond DA40 (Lycoming)	8		



Diamond DA40 D (Thielert)	15		
Diamond DA42 Series (Austro Engine)	6		
Diamond DA42 Series (Thielert)	23		
Dornier 228 (Honeywell TPE331)	106		
Dornier 328-100 (PWC PW119)	63		
Dornier 328-300 (PWC PW306)	9		
Dornier Do 28 (Walter M601)	1		
Dornier Do 28 Series (PWC PT6)	17		
Enstrom 480 (RR Corp 250)	7		
Enstrom F-28 / 280 (Lycoming)	6		
Erickson S-64 (PW JFTD 12)	2		
Eurocopter - helicopter turbine engine (Reference Part-66.A.45(g))	25		
Eurocopter AS 332 (Turbomeca Makila 1A / 1A1)	368		
Eurocopter AS 332 L2 (Turbomeca Makila 1A2)	179		
Eurocopter AS 350 (Arriel)	9		
Eurocopter AS 350 (Turbomeca Arriel 1)	91		
Eurocopter AS 350 (Turbomeca Arriel 2)	23		
Eurocopter AS 355 (RR Corp 250)	218		
Eurocopter AS 355 (Turbomeca Arrius 1)	141		
Eurocopter AS 365 N3 (Turbomeca Arriel 2C)	119		
Eurocopter EC 120 (Turbomeca Arrius 2F)	29		
Eurocopter EC 130 (Turbomeca Arriel 2B)	3		
Eurocopter EC 135 (PWC PW206)	72		
Eurocopter EC 135 (Turbomeca Arrius 2B)	195		
Eurocopter EC 155 (Turbomeca Arriel 2)	88		
Eurocopter EC 225 (Turbomeca Makila 2A)	161		
Eurocopter MBB-BK 117 A / B (Honeywell LTS 101)	12		
Eurocopter MBB-BK 117 C1 (Turbomeca Arriel 1)	35		
Eurocopter MBB-BK 117 C2 (Turbomeca Arriel 1)	42		
Eurocopter SA 315B (Turbomeca Artouste)	2		
Eurocopter SA 316 B / SA 316 C (Turbomeca Artouste)	1		
Eurocopter SA 330 (Turbomeca Turmo)	46		
Eurocopter SA 341 (Turbomeca Astazou)	13		
Eurocopter SA 342 J (Turbomeca Astazou XIV)	10		
Eurocopter SA 365 (Arriel)	2		
Eurocopter SA 365 C Series (Turbomeca Arriel 1)	64		
Eurocopter SA 365 N (Turbomeca Arriel 1)	145		



Eurocopter SA 365 N1, AS 365 N2 (Turbomeca Arriel 1)	175		
Eurocopter/Westland SA 341/2 (Turbomeca Astazou)	9		
Extra EA-300 Series (Lycoming)	6		
Extra EA-400 (Continental)	1		
Fairchild SA226 (Honeywell TPE331)	6		
Fairchild SA227 Series (Honeywell TPE331)	5		
Fairchild SA227 Series (PWC PT6)	23		
Fairchild SA26 AT (Honeywell TPE331)	11		
Fairchild SA26-T (PWC PT6)	1		
Fuji FA-200 Series (Lycoming)	5		
Full group 3	393		
Full sub-group 2a	243		
Full sub-group 2b	141		
Full sub-group 2c	65		
Full sub-groups 2b and 2c	157		
Gates Learjet 31/35/36 (Allied TFE 731)	1		
Gippsland GA8 (Lycoming)	1		
Grob G 520 Series (Honeywell TPE331)	127		
Grob G115 / 120 Series (Lycoming)	51		
Group - aeroplane (Reference Part-66.A.45(g))	409		
Group - aeroplane multiple piston engines - composite structure (Reference Part-66.A.45(g))	267		
Group - aeroplane multiple piston engines - metal structure (Reference Part-66.A.45(g))	367		
Group - aeroplane multiple piston engines - wooden structure (Reference Part-66.A.45(g))	278		
Group - aeroplane multiple turbine engine (Reference Part-66.A.45(g))	15		
Group - aeroplane single piston engine - composite structure (Reference Part-66.A.45(g))	18		
Group - aeroplane single piston engine - metal structure (Reference Part-66.A.45(g))	13		
Group - aeroplane single piston engine - wooden structure (Reference Part-66.A.45(g))	8		
Group - aeroplane single turbine engine (Reference Part-66.A.45(g))	274		
Group - helicopter (Reference Part-66.A.45(g))	155		
Group - helicopter piston engine (Reference Part-66.A.45(g))	48		
Group - helicopter turbine engine (Reference Part-66.A.45(g))	135		
Grumman / American AA-1 Series (Lycoming)	7		



Grumman / American AA-5 Series (Lycoming)	11		
Grumman GA-7 (Lycoming)	11		
Hiller UH-12 (Lycoming 540)	1		
IAI 1121 / 1123 (GE CJ610)F	2		
IAI 1124 (Honeywell TFE731)	6		
Jetstream 200 (Turbomeca Astazou)	1		
Jetstream 31 / 32 (Honeywell TPE331)	342		
Jetstream 41 (Honeywell TPE331)	380		
Kaman K-1200 (Honeywell T5317)	65		
Kamov KA-26D (Vedeneyev) Does not appear in current annexe I listing	1		
Kelowna (Convair) 440 (PW R2800) Does not appear in current annexe I listing	7		
Kelowna (Convair) 600 / 640 (RRD Dart) Does not appear in current annexe I listing	4		
Lake 250 (Lycoming TIO-540)	1		
Learjet 23 (GE CJ610)	18		
Learjet 24 / 25 (GE CJ610)	21		
Learjet 31 (Honeywell TFE731)	61		
Learjet 35 / 36 (Honeywell TFE731)	68		
Learjet 55 (Honeywell TFE731)	18		
Learjet 60 (PWC PW305)	35		
Learjet Model 45 (Honeywell TFE731)	49		
M7 Aerospace (Fairchild) SA 226 / 227 (Honeywell TPE331)	17		
MD 500N / NH500D / AMD500N (RR Corp 250)	2		
MD Helicopters 369 Series / SEI NH-500D (RR Corp 250)	11		
MD Helicopters 500N / 600N AMD500N (RR Corp 250)	2		
MD Helicopters MD900 (PWC PW206 / 207)	80		
MD Helicopters MD900 (Turbomeca Arrius 2)	9		
Manufacturer Bell Sub-Group 2b	1		
Manufacturer Eurocopter Sub-Group 2b	5		
Manufacturer group rating; Robin ASPE-WS	1		
Maule M4 (Continental)	1		
Maule M5 (Lycoming)	5		
Maule M5-180C (Lycoming 360)	2		
Maule M6 (Lycoming)	3		
Maule M7 Series (Lycoming)	3		
Maule MX-7 (Lycoming)	4		
Maule MX-7 (RR Corp 250)	2		
	5		



McD DC6 (PW R2800)	2		
Mitsubishi MU-2B (Honeywell TPE331)	1		
Mitsubishi MU-300 (PWC JT15)	1		
Mitsubishi MU-300 Diamond 1 / 1A (PWC JT15)	30		
Mooney M20 (Continental)	3		
Mooney M20 / M20A (Lycoming)	7		
Mooney M20B to M20S / M22 (Lycoming)	2		
Mooney M20K (RR Continental TSIO-360)	3		
Mooney M20M (Lycoming TIO-540)	2		
Nomad N22 / 24 Series (RR Corp 250)	11		
PAC 750XL (PWC PT6)	17		
PZL M 28 (PWC PT6)	2		
PZL-104 Wilga (Lycoming)	1		
PZL-Swidnik W-3A / W-3AS (Rzeszow PZL-10W) Does not appear in current annex I listing	1		
Partenavia P.64 (Lycoming)	2		
Partenavia P.66 (Lycoming)	3		
Piaggio P166 (Lycoming)	1		
Piaggio P180 Avanti / Avanti II (PWC PT6)	100		
Pilatus PC-12 (PWC PT6)	137		
Pilatus PC-6 (PWC PT6)	65		
Pilatus PC-6 Series (Honeywell TPE 331)	6		
Piper - aeroplane multiple piston engines - metal structure (Reference Part-66.A.45(g))	1		
Piper PA 18 (RR Continental C90)	1		
Piper PA 28-201T (RR Continental TSIO-360)	6		
Piper PA 46 Series (Lycoming)	5		
Piper PA 46 Series (RR Continental)	2		
Piper PA-23 Aztec (Lycoming)	19		
Piper PA-24 Series (Lycoming)	12		
Piper PA-25 Series (Lycoming)	11		
Piper PA-28 Series (Continental)	27		
Piper PA-28 Series (Lycoming)	59		
Piper PA-28 Series (Thielert)	9		
Piper PA-30 Series (Lycoming)	14		
Piper PA-31 Series (Lycoming)	26		
Piper PA-31P (Lycoming)	8		



Piper PA-31T Series (PWC PT6)	158		
Piper PA-32 Series (Lycoming)	25		
Piper PA-34 Series (Continental)	18		
Piper PA-34 Series (Lycoming)	23		
Piper PA-38 Series (Lycoming)	12		
Piper PA-39 / 40 Series (Lycoming)	10		
Piper PA-42 (Honeywell TPE-331)	126		
Piper PA-42 (PWC PT6)	161		
Piper PA-44 Series (Lycoming)	8		
Piper PA-46 Series (Continental)	116		
Piper PA-46 Series (Lycoming)	114		
Piper PA-46-500TP (PWC PT6)	169		
Piper PA-60 / 61 Series (Lycoming)	99		
Piston-engine non-pressurised aeroplanes of 2000Kg MTOM and below	83		
Pitts S-1 Series (Lycoming)	3		
Pitts S-2 Series (Lycoming)	5		
RRJ-95 (PowerJet SaM146)	1		
Raytheon (BAe) 125 / Hawker 800 / 800XP / 850XP (Honeywell TFE731)	10		
Raytheon (Beech) 300 (PWC PT6)	17		
Raytheon (Beech) 350 (PWC PT6)	6		
Raytheon (Beech) 95 Series (Continental)	3		
Reims-Cessna F 406 (PWC PT6)	210		
Robin DR 300 series (Lycoming)	1		
Robin DR 400 series (Lycoming)	7		
Robin HR 100 series (Lycoming)	5		
Robin HR 200 / R 2000 series (Lycoming)	4		
Robin R 3000 series (Lycoming)	2		
Robinson R22 / R44 Series (Lycoming)	81		
Robinson R66 (RR Corp 250)	2		
Ruschmeyer R90-230RG (Lycoming)	2		
SIAI-Marchetti S.205 / S.208 (Lycoming)	2		
SOCATA (Morane Saulnier) MS892 (Lycoming)	3		
SOCATA (Morane Saulnier) MS893 (Lycoming)	3		
SOCATA (Morane Saulnier) Rallye 110ST (Lycoming)	4		
SOCATA (Morane Saulnier) Rallye 150 (Lycoming)	9		
SOCATA (Morane Saulnier) Rallye 180T (Lycoming)	2		
SOCATA (Morane Saulnier) Rallye 235E(Lycoming)	4		



SOCATA Rallye Series (Continental)	7		
SOCATA Rallye Series (Lycoming)	3		
SOCATA TB 10 (Lycoming)	10		
SOCATA TB 20 (Lycoming)	7		
SOCATA TB 200 (Lycoming)	1		
SOCATA TB 21 (Lycoming)	2		
SOCATA TB 9 (Lycoming)	13		
SOCATA TB Series (Lycoming)	3		
Saab (SF) 340 (GE CT7)	202		
Saab 2000 (RR Corp AE2100)	84		
Sabreliner (Rockwell) NA-265 (GE CF700)	5		
Sabreliner NA-265 (Honeywell TFE731)	9		
Sabreliner NA-265 (PW JT12)	3		
Schweizer / Breda Nardi 269 / 300 (Lycoming)	20		
Schweizer 269D (RR Corp 250)	1		
Shorts SC7 (Honeywell TPE331)	120		
Shorts SD3 Series-30 / SD3-60 (PWC PT6)	431		
Sikorsky S-58 (PWC PT6T)	24		
Sikorsky S-70 (GE CT700)	1		
Sikorsky S-76 (Turbomeca Arriel 1)	265		
Sikorsky S-76A (RR Corp 250)	153		
Sikorsky S-76B (PWC PT6)	56		
Sikorsky S-76C (Turbomeca Arriel 1)	170		
Sikorsky S-76C (Turbomeca Arriel 2)	191		
Sikorsky S-92A (GE CT7-8)	220		
Sikorsky S76C (Arriel)	14		
Slingsby T67A (Lycoming)	4		
Slingsby T67B / T67C / T67M series (Lycoming)	29		
Socata TBM 700 / 850 (PWC PT6)	133		
Sukhoi SU-26 (Vedeneev)	1		
Tecnam P92 (Rotax)	1		
Tecnam P96 / P2002 / P2004 (Rotax)	1		
Twin Commander 680 / 681 / 690 / 695 Series (Honeywell TPE331)	140		
Viking Air DHC-3 (PWC PT6)	1		
Vulcanair AP68TP Series (RR Corp 250)	1		
Vulcanair P.68 Series (Lycoming)	8		
Westland W30 (RR Gem)	2		



Westland Wessex (RR Gnome)	1	
Zlin Z-242 L (Lycoming)	1	
Zlin Z-50L Series (Lycoming)	2	

response

Noted

We inform you, however, that:

Beagle B.121 Series 2/3 (Lycoming) aeroplanes are already in Group 3 under TCH De Havilland Support.

Cessna 206/207 (Soloy) is in Group 2a under TCH CESSNA Aircraft Company.

Cessna P201N (Continental) is included in the existing Cessna P210 (Continental) in Group 3.

PZL-Swidnik W-3A/W-3AS (Rzeszow PZL-10W) is already in Group 1 Helicopters.

Following your request, we may amend the list of STCs if you can provide the following information:

Cessna 195 (Jacobs), please provide STC holder.

Champion 7 (Continental), please provide STC holder.

Kamov KA-26D (Vedeneyev) is an Annex II aircraft, so no type rating can be added in the list of Part-66 type ratings. However, this aircraft rating may be endorsed as a national privilege.

Same comment for Kelowna 440 and 600/640 which is also an Annex II aircraft.

2. Explanatory Note p. 4-6

comment

12 comment by: *Blib*

2.4.(a)(1)(i) Airbus A319/320/321 NEO (IAE PW1100)
The engines are not provided by IAE, it should be :
Airbus A319/320/321 NEO (PW PW1100G)

2.4.(a)(1)(ii) Airbus A319/320/321 NEO (CFM LEAP)
This is not the full name of the engines, it should be :
Airbus A319/320/321 NEO (CFM LEAP-1A)

But as there was no such precision for all variants of CFM56 engines, it is perhaps not important

response

Partially accepted

The manufacturer of PW1100 is Pratt and Whitney, but IAE holds the TC of the engine for the Airbus A319/320/321 NEO (see TCDS). The addition of letter 'G' is accepted (IAE PW1100G). Regarding Leap engine, you are right, we selected to add the dash numbers accordingly.

AIRBUS	A319-150	A319 NEO	Airbus A319/320/321 NEO (CFM LEAP-1A)
	A320-150	A320 NEO	
	A321-150	A321 NEO	

comment

14 comment by: *FlightSafety International*



Currently in the Notice of Proposed Amendment 2014-14, the Embraer EMB-545 (Honeywell AS907) and EMB-550 (Honeywell AS907) are listed to be added type ratings in Group 1 under 2.4. (a) (1). These aircraft are also listed under Group 1 of Appendix I Aircraft Type Ratings For Part-66 Aircraft Maintenance License. FlightSafety International recommends that a single rating be established for these aircraft based on construction and operational commonality.

The most significant change impacting most aircraft systems is the change in length and position of wiring harnesses, ducts, tubes, and cables as the result of a change in fuselage length. However, such changes have no significant impact on systems operation or maintenance.

There are 4 ATA systems that have notable differences. Structurally these aircraft are approximately 5% different as the EMB-545 fuselage is 1 meter shorter and has a slightly longer aft wing to fuselage fairing. The Fuel system is also about 10% different as the EMB-545 wing tanks are modified for less fuel volume and its engine/APU fuel feed lines are shorter due to fuselage shortening. Software adjustments were also required for refueling and indication due to the fuel volume change. The EMB-545 and EMB-550 are both equipped with the same engine but the Power Plant system is about 5% different with FADEC software changes to thrust limits for the lighter EMB-545. The interior cabins are less than 5% different with the EMB-545 having just two less passenger seats. These differences also have little or no impact regarding operation or maintenance of these systems.

response

Accepted

The list has been modified accordingly.

EMBRAER	EMB-545	Legacy 450	Embraer EMB-545/550 (Honeywell AS 907)
	EMB-550	Legacy 500	

comment

25

comment by: SVFB/SAMA

Attachment [#1](#)

As a first step the following short list of aircraft should be moved **off Group 1:**

- Eclipse EA500 (PWC PW610)
- Dornier Do 28 Series (PWC PT6)
- Twin Commander 680/681/690/695 Series (Honeywell TPE331)
- De Havilland DHC-6 (PWC PT6)
- Vulcanair AP68TP Series (RR Corp 250)
- Bell 212/Agusta AB212 (PWC PT6)
- Bell 412/Agusta AB412 (PWC PT6)
- Agusta A109 Series (RR Corp 250)
- Bell 222 (Honeywell LTS 101)
- Bell 430 (RR Corp 250)
- Twin Commander 680/681/690/695 Series
- Cessna 401/402 (Continental)
- Cessna 404 (Continental)
- Cessna 411 (Continental)
- Cessna 414 (Continental)
- Cessna 421 (Continental)
- Cessna 425 (PWC PT6)



	<p>Cessna 441 (Honeywell TPE331) Convair 580 (RR Corp 501) Hawker Beechcraft Beech 99/100 Series Learjet 23 (GE CJ610) Learjet 24/25 (GE CJ610) Learjet 31 (Honeywell TFE731) Learjet 35/36 (Honeywell TFE731) Piper PA31T series Piper PA42 series Shorts SC7 (Honeywell TPE331) Agusta AS61N/Sikorsky S-61N (GE CT58) Sikorsky S-76A (RR Corp 250) Sikorsky S-76B (PWC PT6)</p> <p>In a second step all aircraft, following a risk based approach, whom are not used or not usable for mass CAT or aircraft >18 should be moved off group 1. See attachment This would be a rather conservative approach. That by this proposal > 400 aircraft would be moved from Group 1 is a impressive indication of the problems SME's are faced by the present TR Regulation.</p>
response	<p><i>Not accepted</i></p> <p>See response to comment No 24, point 1.</p>

comment	<p>33</p> <p>comment by: <i>Lufthansa Technical Training GmbH</i></p> <p>Comment: The Part-66 aircraft type rating of Boeing 747SP should not be suspended or revoked. Statement: EASA has changed the TCDS of Boeing 747 to the effect that the B747SP variant has been cancelled. (Comment provided by EASA: 'The 747SR, 747SP, 747-100B, 747-100B SUD and 747-400D series are not included in this TCDS as none has been identified as being eligible under Regulation 1702/2003.')</p> <p>Although there are no B747SP registered in the EU or an EASA member state, Part-145 maintenance organizations located in the EU or an EASA member state are still maintaining such aircraft under foreign (!) approvals (e.g. FAR-145 repair station). Such foreign approvals are mostly based on the existing EU Part-145 approval and its licensing system. A revocation of the B747SP Part-66 type rating endorsement could lead to a situation that makes approved maintenance on this aircraft type impossible ("chain reaction"). Instantly numerous foreign aviation regulations by means of licensing requirements would have to be applied individually and in full. This causes an impact on the MRO industry that most organizations cannot afford. Although the statement above is given in the light of the current cancellation of the B747SP, it is highlighting a <u>general problem</u> which is applicable for all Group 1 Aircraft. The interdependencies in a globalized MRO market should be well anticipated when suspending EASA AML prerequisites / endorsements.</p>
response	<p><i>Not accepted</i></p> <p>If the aircraft is not certified in the EU, it cannot be included in the list of type ratings.</p>



Furthermore, the aircraft model should not be included in the EASA Part-145 approval of the organisation.

The system works exactly the same way in the case of the US. The FAA does not allow the inclusion of an aircraft which is not certified in the US in the scope of work of an FAA repair station.

3. Proposed amendments

p. 7-43

comment

1

comment by: ACE

Dear EASA,
My comment is about a small mismatch. At the beginning of the AMC in the second note: "Notes on aircraft modified by STC" the following text should be revised.
"The **NPA** intends..." is wrong and should be "The **AMC** intends..."
Otherwise we are satisfied with this NPA.
Thanks.

response

Accepted

The initial change was made in the NPA, but it is correct that now it is in the AMC.
So the text has been modified accordingly.
'The AMC intends...'

comment

9

comment by: Christian Pohlschneider

Dear Ladies and Gentlemen,
I want to bring up the proposal to put the Cessna 400series in Group 3 Aeroplanes, because the 400serie is the only piston engine aircraft which was ranged in Group 1. The only difference from the group 1 aeroplanes to the 400series is the maximum service ceiling which was overshooted by approximately 1000ft. There is no significant technical difference or maintenance difference between the Cessna 300series to the 400series. By the way no training course for the 400series is provided in Germany or America and the development of an own technical training course is not practicable at all. Please review this decision.
Best Regards
Christian Pohlschneider CAT B1.2

response

Not accepted

The allocation of Cessna 400 Series in Group 1 requires the amendment of Commission Regulation (EU) No 1149/2011 which defines the aircraft groups (Group 1: their maximum cruising altitude exceeds FL290). A reallocation in Group 3 requires the amendment of Part-66.

For information: The intent of the working group to propose FL290 to define Group 1 was to require type training when structure repairs start to become complex when the structure is certified for high altitude.

comment

10

comment by: ParTem Aviation



Page 41 - SLINGSBY Aviation: ONLY T67A is wood + metal tubing + fabric construction.
 Table should show:
 SLINGSBY Aviation Slingsby T67A (Lycoming) Wood + Metal tubing fabric
 Slingsby T67B/T67C/T67M Series (Lycoming) Composite

response

Accepted

The list has been modified accordingly.

SLINGSBY Aviation	Slingsby T67A (Lycoming)	Wood + Metal tubing fabric
	Slingsby T67A /T67B/T67C/T67M Series (Lycoming)	Composite

comment

13

comment by: *Technify Motors GmbH*

1.) "Thielert or Technify" should be mentioned in the brackets. Since July 2013 Technify is manufacturer for all engines of the Centurion engine series.
 2.) The list of Technify Motors GmbH need to be supplemented as follows: PA28-181 (STC No. 10014364, Rev. 10) and Diamond DA 40 D (STC No. 10036328, Rev. 1)

response

Partially accepted

We will consider replacing the name 'Thielert' with 'Technify', but not using both names because:

- the rating of an aircraft is the combination of *airframe TC holder name plus engine TC holder name* (in simplified wording);
- in case of change, we cannot use both the old one and the new one, but a single one which is the name presently known in TCDS.

As the TCDS is now in the name of Technify Motors GmbH, the simplified designation is 'Technify'.

Regarding the STC modification for installation of Thielert engine on PA28-181 aircraft, you are right, we can consider to include that aircraft into the type rating. However, regarding the STC for Diamond DA40 D, the type rating (even resulting from another STC) is already included in the original **Diamond DA40 D (Thielert)** rating.

comment

15

comment by: *FlightSafety International*

Currently in the Notice of Proposed Amendment 2014-14, the Embraer EMB-545 (Honeywell AS907) and EMB-550 (Honeywell AS907) are listed to be added type ratings in Group 1 under 2.4. (a) (1). These aircraft are also listed under Group 1 of Appendix I Aircraft Type Ratings For Part-66 Aircraft Maintenance License. FlightSafety International recommends that a single rating be established for these aircraft based on construction and operational commonality.

The most significant change impacting most aircraft systems is the change in length and position of wiring harnesses, ducts, tubes, and cables as the result of a change in fuselage length. However, such changes have no significant impact on systems operation or maintenance.



There are 4 ATA systems that have notable differences. Structurally these aircraft are approximately 5% different as the EMB-545 fuselage is 1 meter shorter and has a slightly longer aft wing to fuselage fairing. The Fuel system is also about 10% different as the EMB-545 wing tanks are modified for less fuel volume and its engine/APU fuel feed lines are shorter due to fuselage shortening. Software adjustments were also required for refueling and indication due to the fuel volume change. The EMB-545 and EMB-550 are both equipped with the same engine but the Power Plant system is about 5% different with FADEC software changes to thrust limits for the lighter EMB-545. The interior cabins are less than 5% different with the EMB-545 having just two less passenger seats. These differences also have little or no impact regarding operation or maintenance of these systems.

response

Accepted

See response to comment No 14.

comment

16

comment by: AESA

Proposed deletions: strike through, proposed additions: grey background

TC Holder	Model	Commercial Designation	Part 66 Type rating endorsement
Cessna Aircraft Company	560XLS	Citation XLS	Cessna 560 XL/XLS (PWC 545)
	560XLS+	Citation XLS+	
	560XL Excel	Citation Excel	

response

Partially accepted

The designation in column 2 (Model) is changed to keep the single designation '560XL' which includes the three commercial designations (in the next column): Citation XLS, Citation Excel, and Citation XLS+. However, the final type rating should not be changed because it is not wrong and a change as proposed would have a significant impact on all licences endorsed with this rating.

comment

17

comment by: AESA

TC Holder	Part 66 Type rating endorsement	Type of structure	Observations
PIPER AIRCRAFT	Piper PA-46 Series (Lycoming)	Metal	Model PA-46R-350T (Lycoming, not pressurised)
	Piper Pa-46 Pressurised (Lycoming)	Metal+pressurised	
	Piper PA-46 Series (Continental)	Metal	There are not models with continental engine and not pressurised
	PIPER PA-46 Pressurised (Continental)	Metal+pressurised	Model PA-46-310P (Continental, pressurised)



response	Proposed deletions: strike through , proposed additions: grey background									
response	<p><i>Accepted</i></p> <p>The list has been modified accordingly.</p> <table border="1" data-bbox="359 369 1268 504"> <tr> <td data-bbox="359 369 566 414">PIPER AIRCRAFT</td> <td data-bbox="566 369 1029 414">PIPER PA-46 Pressurised (Continental)</td> <td data-bbox="1029 369 1268 414">Metal+Pressurised</td> </tr> <tr> <td data-bbox="359 414 566 459"></td> <td data-bbox="566 414 1029 459">Piper Pa-46 Pressurised (Lycoming)</td> <td data-bbox="1029 414 1268 459">Metal+Pressurised</td> </tr> <tr> <td data-bbox="359 459 566 504"></td> <td data-bbox="566 459 1029 504">Piper PA-46 Series (Lycoming)</td> <td data-bbox="1029 459 1268 504">Metal</td> </tr> </table>	PIPER AIRCRAFT	PIPER PA-46 Pressurised (Continental)	Metal+ Pressurised		Piper Pa-46 Pressurised (Lycoming)	Metal+Pressurised		Piper PA-46 Series (Lycoming)	Metal
PIPER AIRCRAFT	PIPER PA-46 Pressurised (Continental)	Metal+ Pressurised								
	Piper Pa-46 Pressurised (Lycoming)	Metal+Pressurised								
	Piper PA-46 Series (Lycoming)	Metal								
comment	<p>18 comment by: <i>Dassault Aviation</i></p>									
response	<p>Appendix 1 / « STCs in AEROPLANES GROUP 1 »</p> <p>The table should make clear which parts of the a/c are covered by the STC and which parts stay under TC holder (identification to be explicitly mentioned) perimeters, in order that Airworthiness responsibilities and Type Rating training aspects are adequately considered.</p>									
response	<p><i>Not accepted</i></p> <p>The purpose of the document 'list of type ratings' is to cater for the licensing needs. The STCDS remains the document of reference where the list of parts covered by the STC is clearly defined and where the interfaces between the airframe and the engines can be understood for the purpose of continuing airworthiness, maintenance, or training.</p>									
comment	<p>22 comment by: <i>Airbus Operations GmbH</i></p>									
response	<p>Section to comment on: NPA 2014-10, Chapter 3. Proposed amendments, Appendix I, Aircraft Type Ratings for Part-66 Aircraft Maintenance Licence (AML), Group 1 Aeroplanes, NPA Page 11 of 45</p> <p>Comment/Proposal: With this NPA, the AML ratings for the Airbus A319/320/321 NEO aircraft shall be introduced. For the models A319-170, A320-270 and A321-270, the engines are wrongly identified as "(IAE PW 1100)". => Airbus requests to correct the Part-66 Type rating endorsement to read: "Airbus A319/A320/A321 (PW 1100)"</p> <p>Justification: Correction is requested to ensure consistent and correct AML Part-66 training documentation.</p>									
response	<p><i>Not accepted</i></p> <p>The manufacturer of PW1100 is Pratt and Whitney, but IAE holds the TC of the engine for the Airbus A319/320/321 NEO (see TCDS). For some other aircraft types (Bombardier C Series, Embraer E-Jet E2, Mitsubishi MRJ and Irkut MC-21), the TC holder for PW1100 engines is Pratt & Whitney.</p> <p>See response to comment No 12.</p>									
comment	<p>27 comment by: <i>DGAC France</i></p>									



Although this is not a change linked to this NPA, DGAC France would be pleased if the EASA could explain which criteria of 66.A.5 has led the Cessna 401/402 and Cessna 414 in Group 1 instead of Group 3.

response

Noted

The Cessna 400 is in Group 1 because it meets the definition of Group 1 aircraft (one of the criteria is that the maximum altitude FL is more than 290). The removal of Cessna 400 Series from Group 1 requires the amendment of Commission Regulation (EU) No 1149/2011 which defines the aircraft groups (Group 1: their maximum cruising altitude exceeds FL290).

comment

30

comment by: *Embraer - Indústria Brasileira de Aeronáutica - S.A.*

Embraer endorses the comments sent by Flight Safety International and would like to point out the following:

The NPA 2014-10 lists the two new executive aircraft made by Embraer: model Legacy 450 (EMB-545) and model Legacy 500 (EMB-550) equipped with the same engine (Honeywell HTF7500E) and certified at the same Type Certificate (EMB-550).

The two models have 95% of common parts and the most relevant difference is in their length, with a difference of 1 meter, which results in adjustment of system, wiring harnesses, ducts, tubes and cables.

The avionic system and engines use the same hardware, with some software adjustments due to the weight and length of the aircraft.

The AFM and MMEL are proposed to be the same for both models.

Therefore, we request the same Type Rating for these aircraft.

response

Accepted

See response to comment No 14.

comment

31

comment by: *Airbus Helicopters*

Attachment [#2](#)

Add on page 31 in column Model:

EC 635 T3

below of EC 635 T2+

See also attached "Seiten aus NPA 2014-10 Appendix I ...".

Best regards

Franz Meier

Airbus Helicopters Deutschland GmbH

response

Accepted

The change to add T3 models was planned already as follows:

AIRBUS	EC 135 T1	Eurocopter EC 135 (Turbomeca Arrius 2B)
HELICOPTERS	EC 135 T2	
DEUTSCHLAND	EC 135 T2+	
GmbH	EC 135 T3	
	EC 635 T1	
	EC 635 T2+	



	EC 635 T3	
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comment 32 comment by: Airbus Helicopters

Attachment [#3](#)

Add on page 30 in column Model:
 EC 635 P3
 below of EC 635 P2+
 See also attached "Seiten aus NPA 2014-10 Appendix I ...".
 Best regards
 Franz Meier
 Airbus Helicopters Deutschland GmbH

response *Accepted*

The change to add P3 models was planned already as follows:

AIRBUS	EC 135 P1	Eurocopter EC 135 (PWC PW206)
HELICOPTERS	EC 135 P2	
DEUTSCHLAND	EC 135 P2+	
GmbH	EC 135 P3	
	EC 635 P2+	
	EC 635 P3	

comment 35 comment by: Airbus Helicopters

Attachment [#4](#)

See the attachment.

response *Accepted*

See response to comment No 31 and No 32.



3. Appendix A — Attachments

 [TR G1 candidates to move to G2 or G3 EDD-2013.024 v140620-1433.xls.pdf](#)

Attachment #1 to comment [#25](#)

 [Seiten aus NPA 2014-10 Appendix I - Aircraft type ratings for P\(RMT 0541\).pdf](#)

Attachment #2 to comment [#31](#)

 [Seiten aus NPA 2014-10 Appendix I - Aircraft type ratings for P\(RMT 0541\).pdf](#)

Attachment #3 to comment [#32](#)

 [Comments on NPA 2014-10 Appendix I - Aircraft type ratings for P\(RMT 0541\).pdf](#)

Attachment #4 to comment [#35](#)

