European Union Aviation Safety Agency

Comment-Response Document 2018-13

RELATED NPA 2018-13 — RMT.0541

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1. Summary of the outcome of the consultation

There are 19 unique comments on this NPA made by 13 users.

- Accepted: 9
- Partially accepted: 0
- Noted: 4
- Not accepted: 6

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2. Individual comments and responses

In responding to comments, the following terminology has been applied to attest EASA's position:

(a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.

(b) **Partially accepted** — EASA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.

(c) **Noted** — EASA 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 EASA.

2.1. CRD table of comments, responses and resulting text

(General Comments)	-

comment	*5* comment by: *UK CAA* Thank you for the opportunity to comment on NPA 2018-13, Appendix I to AMC to Annex III (Part-66), Aircraft type ratings for Part-66 aircraft maintenance licences. Please be advised there are no comments from the UK Civil Aviation Authority.
response	*Noted.*

comment	*6* comment by: *FNAM* For years, General Aviation Professionals have requested EASA to modify the Group categorization of some aircraft models for operational reasons. Proposed NPA highlights that these requests have still not been listened nor studied. Since ECOGAS (European Council of General Aviation Support) is still not included in the discussions of RMT.0541, we wonder on which bases/lobbies EASA relies on to modify current regulation. **Our first proposal is therefore to include ECOGAS into RMT.0541 meetings and discussions to ensure that all impacted stakeholders are consulted during the first rulemaking procedure step.** Current maintenance requirements for some Group 1 and 2 aircraft are difficult to meet due to operational constrains, in particular for General Aviation aircraft. Maintenance cost is highly impacted by these constrains which penalizes operators, maintenance organizations but also final users. Competitiveness of General Aviation organizations is therefore indirectly impacted. Moreover, allocated resources to meet current requirements for Group 1 and 2 aircraft focuses more on administrative tasks than ensuring flight safety. For instance, some non-Group 3 aircraft models operated in General Aviation do not have Part-147 training anymore which is inconsistent with the goal of increasing flight safety. This issue has currently not been dealt with. Therefore, **FNAM/GIPAG proposes to move some aircraft model to another Group according to the Table here-below even though some aircraft models fit the conditions and definitions of Group 1 and 2.**

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Moreover, in order to review aircraft categorization and to adapt it to operational reality, we suggest to add 3 columns to the proposed Tables :

- **One column precising if the aircraft model is pressurized or not ;**
- **One column precising aircraft MTOM ;**
- **One column precising if the aircraft is complex or not.**

PROPOSALS :

Group 1 to Group 3	Group 1 to Group 2a	Group 2a to Group 3
402C 414A 421B 421C 404 401 402 411 414 421 401A 401B 402A 402B 411A 421A 441	PA46-500TP PA46-600TP G520 EGRETT G520T	

response *Not accepted.*

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EASA thanks UK-CAA for their comments and the proposals for the reclassification received.
However, at this stage, EASA has decided not to reclassify any aircraft from Group 1 to a different group.
As indicated in 66.A.5, reclassification can only be done on the basis of a lower complexity of the particular aircraft, but at this point in time, there are no objective criteria available to justify a lower complexity of the particular aircraft.
EASA understands the difficulties in acquiring the necessary knowledge if there is no Part-147 approved training available, in particular for 'legacy' aircraft. This issue will be addressed also by the upcoming RMT.0255 'Review of the Part-66'.
In addition, the regulation provides the means to deal with this situation through a direct approval of a type rating as per 66.B.130 by a competent authority.
Regarding the participation to the recurrent RMT.0541, this is an Agency task, which main action is to update the TR list with new models, classified according to the attributes definition given by 66.A.5. in a transparent way. Type certification and manufacturer recommendations are the main inputs for the definition of type-ratings.
Considering that new aircraft categories will be introduced (e.g. electrical propulsion) and some definitions may disappear or change, it will better to have in place a type rating database that is structured with a defined taxonomy without exceptions or particular cases.
Note: EASA is studying some solutions how to make accessible additional characteristics of the models: MTOW, CMPA, pressurised, etc.

comment	*19* comment by: *EUROCONTROL* There are no EUROCONTROL comments on this NPA 2018-13 'Appendix I to AMC to Annex III (Part-66) - Aircraft type ratings for Part-66 aircraft maintenance licences'.
response	*Noted.*

comment	*20* comment by: *Europe Air Sports* Europe Air Sports supports this NPA and thanks EASA for the "ELA1" and "ELA2" indications, which add clarity for maintenance organisations.
response	*Noted.*

2. In summary—why and what p. 4

comment	*2* comment by: *Emma Lindsjö* SOCATA (DAHER AEROSPACE) TB 10 MTOW is 1150 according to TCDS EASA.A.378, so should it not be ELA1?
response	*Accepted.* Text will be corrected to 'ELA1'.

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2.4 Details of the changes p. 5-53

comment	*7* comment by: *CAA-NL* (page 37) 2. In summary-why and what; In the column "reason for the change" it is indicated for the SONACA 200 (Rotax) that only the ELA note is added. But the aircraft type itself is also added in this list.
response	*Accepted.* Text will be added in the 'Reason for the change' to specify that this new model has been added.

3.1. Draft Appendix I to AMC to Annex III (Part-66) p. 54-56

comment	*8* comment by: *CAA-NL* (page 54) 3.1 Draft appendix I to AMC to Annex III (Part-66); The sentence "*The tables may erroneously contain aircraft models that fall within the definition of Annex I aircraft of Regulation (EU) 2018/1139. The requirements of Part-66 do not apply to these aircraft."* Seems strange. This disclaimer indicates that the EASA system, after all these years of discussion on Annex II, now Annex I, may still be polluted with non-EASA aircraft. We apply the Aircraft types mentioned in the list as an indication that a Part-66 license is necessary.
response	*Noted.* This precautionary text has been inserted because there could be a minor 'pollution' risk due to the introduction of Group 4 aircraft and some aircraft models be classified as Annex I by the NAA.

GROUP 1 AEROPLANES p. 57-92

comment	*1* comment by: *GeoFly GmbH* We are of the opinion that the following aircraft should be moved to Group 3, or to be handled with an special Group exemption: All **Cessna 400 Series** aircraft equipped with **piston engines**, consisting of: • Cessna 401 [Incl. submodels] (Continental) • Cessna 402 [Incl. submodels] (Continental) • Cessna 404 [Incl. submodels] (Continental) • Cessna 411 [Incl. submodels] (Continental) • Cessna 414 [Incl. submodels] (Continental) • Cessna 421 [Incl. submodels] (Continental) **Reason / Explanation:** We understand that the above mentioned *Cessna 400 Series* aircraft are grouped with the Group 1 aircraft mainly because of their original (FAA) certification and their

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maximum service ceiling exceeding 29.000 ft. in some cases. Also we understand that this would render the aircraft as RVSM aircraft (Reduced Vertical Separation Minimum, starting at FL290).

The Cessna 400 (Continental) Series aircraft have been produced in large numbers and are still widely used around the world (especially in North- and South America) because of their versatility, availability and capability. The principal aircraft concept, design, structure, controls and engines are very much alike compared to all other single- and multiengine- Cessnas from this era. The differences in technical design, handling and maintenance are often similar to a point extreme comparability.
Grouping those aircraft under Group 1 instead of 3, renders the whole (piston) series almost unusable in the EASA system, because:

1. Part MF/145 Maintenance Organisations engaged in piston aircraft maintenance will most likely not have any or multiple aircraft from the Cessna 400 series aircraft in their capability.
2. Part M CAMO Organisations engaged in continuing airworthiness management will most likely not have any or multiple aircraft from the Cessna 400 series aircraft in their capability.
3. Certifying Staff holding the capability of releasing maintenance and/or continuing airworthiness tasks on those aircraft are scarce and hard to be found.
4. There is almost no approved maintenance training available for those series of aircraft, as required by the Part 66 regulation for an AML entry.
5. Otherwise extending the maintenance capability of personnel/MRO to those aircraft, is almost impossible.
6. Owners and operators face huge problems when operating those aircraft over a medium to large area because of the dependence of scarcely approved maintenance organisations and personnel.
7. Operating a fleet of multiple and extremely alike aircraft (e.g. Cessna 402B, 402C & 414) is made extremely hard again, because of the requirements of different Group 1 approvals for Part 145, Part 66 and Part M.
8. While in company or private use, operational occurrences and cases like simple AOGs, troubleshooting etc. outside of the availability area of approved maintenance organisations, face the owners/operators with enormous risks in sending those aircraft abroad.
9. Overall, the classification as Group 1 aircrafts makes the operation of those (otherwise) widely used aircraft very dependent, risk-loaded and very expensive. The overall impact on the small utility and commuter industry is extremely large in the EASA system compared to other ICAO members.

As shown above, the classification impacts the whole (private and commercial) GA with a disproportionate business disadvantage from owners, operators, maintenance personnel and support infrastructure.
The improper classification in Group 1 and necessity to change that gets even more visible, when comparing other technical very alike but in some cases even technical more complex Group 3 aircraft like the Cessna 340 Series.
This also impacts otherwise experienced and engaged maintenance personnel to a deprivation of skills and privileges.

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A simple solution must be found to move ALL Cessna 400 series (Continental) aircraft to Group 3, so that those can be maintained by personnel holding Full Group 3 or similar ratings.
Proposal:
The agency should immediately reconsider the classification of the mentioned aircrafts. This should be done in view of the fact, that the current classification is merely based on technicalities in the old type certification.
If not possible in any other way, the Agency should consider and draft exemptions for the aircraft series mentioned.
Even the option of limiting the maximum service ceiling for all those aircraft to below 29.000 ft. by an AD, SAS or otherwise appropriate tools should be considered. One very important aspect of this consideration is also, that in reality almost none of the mentioned **Cessna 400 series aircraft is able to even reach altitudes of 29.000 ft.**.
Limiting or otherwise handily the issue of the maximal certified service ceiling would have almost no practical impact on the industry, in comparison to classifying the aircrafts as Group 1.
By reclassifying all of the Cessna 400 Piston aircraft into Group 3, the EASA could finally correct an old error that has way more impact to the industry than apparently known to the agency.
This reclassification would open a lot of possibilities to operators in Europe, fuel the maintenance-, continuing airworthiness and support industry in GA with very much needed business and opportunities for the next 10-20 years.

response

Not accepted.

EASA thanks GeoFly GmbH for their comments and the proposals for the reclassification received.
However, at this stage, EASA has decided not to reclassify any aircraft from Group 1 to a different group.
As indicated in 66.A.5, reclassification can only be done on the basis of a lower complexity of the particular aircraft, but at this point in time, there are no objective criteria available to Justify a lower complexity of the particular aircraft.
These aircraft are not certified by EASA and EASA has no information that the certified maximum operating altitude of individual aircraft is below 29 000ft,
EASA understands the difficulties in acquiring the necessary knowledge if there is no Part-147 approved training available, in particular for 'legacy' aircraft. This issue is addressed also by the upcoming RMT.0255 'Review of the Part-66'.
In addition, the regulation provides the means to deal with this situation through a direct approval of a type rating by a competent authority as per 66.B.130.

Last consideration: considering that new aircraft categories will be introduced into the EASA system (e.g. electrical propulsion) and some definitions may disappear or change, it will better to have in place a type rating database structured with a defined taxonomy without exceptions or particular cases.

comment

9 comment by: *CAA-NL*

Page 58 Group 1 Aeroplanes; General comment on the Airbus type ratings. CAA-NL uses this EASA list of type ratings for the notation of aircraft types on the Part-145 approval certificates minus the engine. As a result for the A320 and A320 NEO's there is no distinction on the certificate with the A320 CEO (Classic Engine Options)

	because the model numbers are not added in the type rating (ex. A330-900). For the Boeing aircraft this is more clear; the Boeing 737MAX (Boeing 737-7/8/9) is different from the 737NG (Boeing 737-600/700/800/900). A more common approach would be recommended.
response	*Not accepted.*
	The TR endorsement logic was driven by the different approach for the identification of the models in the TCDS that was used by the two manufacturers.

comment	*10* comment by: *AIRBUS* **1. PAGE / PARAGRAPH / SECTION THE COMMENT IS RELATED TO:** Page 58 of 186, group 1 aeroplanes **2. PROPOSED TEXT / COMMENT:** The column "Note" specifies that the Type Certificate for the model A319-151N has not been released. It is proposed to delete this note. **3. RATIONALE / REASON / JUSTIFICATION for the Comment:** The Type Certificate for the model A319-151N has been released. Refer to TCDS issue 37 dated 16-Jan-2019.
response	*Accepted.*

comment	*11* comment by: *AIRBUS* **PAGE / PARAGRAPH / SECTION THE COMMENT IS RELATED TO:** Page 58 of 186, group 1 aeroplanes **2. PROPOSED TEXT / COMMENT: Suggested change** The column "Note" gives the impression that the Type Certificate for the model A320-253N has been released. It is proposed to add the following note: "TC not yet released". **3. RATIONALE / REASON for comment: Justification** The Type Certificate for the model A320-253N has not been released yet in accordance with the TCDS issue 37 dated 16-Jan-2019.
response	*Not accepted.* A320-253N is now certified (see EASA.A.064 22 Feb. 2019).

comment	*12* comment by: *AIRBUS* **1. PAGE / PARAGRAPH / SECTION THE COMMENT IS RELATED TO:** Page 58 of 186, group 1 aeroplanes **2. PROPOSED TEXT / COMMENT: Suggested change** It is proposed to add the model A320-211. **3. RATIONALE / REASON for comment: Justification** Some A320-211 are still in service.
response	*Accepted.* A320-211 was deleted accidentally.

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comment	*13* comment by: *Head of QA Ryanair* Dear Sir/Madam Regarding the Boeing Model 737-8, is it possible to include confirmation at this stage that the Boeing 737-8200 will have the category of Part-66 Type rating endorsement Boeing 737-7/8/9 (CFM LEAP-1B) assigned? Thank you, King Regards Gerard McGrath
response	*Accepted* The 737-8200 model will be introduced in the list with the same type rating endorsement as the 737 MAX family.

comment	*15* comment by: *Luftfahrt-Bundesamt* First of all, we welcome the update of the new type rating list for Part-66. We appreciate the thought that went into including the required parts for the upcoming category L licences. Unfortunately the opportunity opened up by the Regulation (EU) 2018/1142, which went into force on the 05th of September 2018 and is valid from the 05th of March 2019, by amending the Article 66.A.5 of Part-66 (Regulation (EU) Nr. 1321/2014) are not taken into account in this NPA. The amending regulation opens up the possibility in 66.A.5 for the agency to regroup aircraft from Group 1 into Group 2, 3 and 4 (depending on the type of aircraft in question). As the Decision of this NPA is planned for Q2 of 2019 (i.e. likely after 05th of March 2019, which is by coincidence the end date of the comment period as well) this is a legally viable and recommended option. *'66.A.5 Aircraft groups* *For the purpose of ratings on aircraft maintenance licences, aircraft shall be classified into the following groups:* *(1) Group 1: complex motor-powered aircraft, helicopters with multiple engines, aeroplanes with maximum certified operating altitude exceeding FL290, aircraft equipped with fly-by-wire systems, gas airships other than ELA2 and other aircraft requiring an aircraft type rating when defined as such by the Agency.* ***The Agency may decide to classify into Group 2, Group 3 or Group 4, as appropriate, an aircraft which meets the conditions set out in the first subparagraph, if it considers that the lower complexity of the particular aircraft justifies so**.* *(2) Group 2: aircraft other than those in Group 1 belonging to the following subgroups:* *(i) subgroup 2a: — single turboprop engine aeroplanes, —* ***those turbojet and multiple-turboprop aeroplanes classified by the Agency in this subgroup because of their lower complexity.*** *(ii) subgroup 2b: — single turbine engine helicopters, —* ***those multiple turbine engine helicopters classified by the Agency in this subgroup because of their lower complexity.*** *(iii) subgroup 2c: — single piston engine helicopters, —* ***those multiple piston engine helicopters classified by the Agency in this subgroup because of their lower complexity**.* *(3) Group 3: piston engine aeroplanes other than those in Group 1. (4) Group 4: sailplanes, powered sailplanes, balloons and airships, other than those in Group 1.';*

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While we urge caution in being too accommodating with any such wishes, a few of the ratings in question would fit the bill and be a better handled by allocating them to Group 2 or Group 3
We have identified the following ratings that should be reconsidered for such a reallocation in accordance with 66.A.5 as amended by Regulation (EU) 2018/1142:

Current Group	TC Holder	Model	Com. Des.	Part-66 type rating endorsement	Note	Reason for the current Group	Proposed new Group
1	AIR TRACTOR, INC.	AT-802		Air Tractor AT-800 Series (PWC PT6)		According to EASA.IM.A.274 MTOM above 5700kg	2a
1	AIR TRACTOR, INC.	AT-802A		Air Tractor AT-800 Series (PWC PT6)		According to EASA.IM.A.274 MTOM above 5700kg	2a
1	ASI AVIATION	F 406		Reims-Cessna F 406 (PWC PT6)		According to EASA.A.109 two turboprop engines and max. operating altitude of 30000ft	2a
1	TEXTRON AVIATION Inc.	402C		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	414A		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	421B		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	421C		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating	3

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						altitude of 30000ft	
1	TEXTRON AVIATION Inc.	404		Cessna 400 Series (Continental)	Should the TITAN not be a different Rating if it is a different FAA TC from the rest of the 400 series entries?	According to grandfathered US TC A25CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	401		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	402		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	411		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	414		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	421		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	401A		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating	3

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						altitude of 30000ft	
1	TEXTRON AVIATION Inc.	401B		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	402A		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	402B		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	411A		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	421A		Cessna 400 Series (Continental)		According to grandfathered US TC A7CE operating altitude of 30000ft	3
1	TEXTRON AVIATION Inc.	425	Corsair / Conquest I	Cessna 425 (PWC PT6)		According to grandfathered US TC A7CE two turboprop engines and operating altitude of 30000ft	2a
1	TEXTRON AVIATION Inc.	441	Conquest	Cessna 441 (Honeywell TPE331)		According to grandfathered US TC A28CE two turboprop engines and operating altitude of	2a

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						33000ft/35000ft	
1	PIPER AIRCRAFT	PA-46-500TP	Malibu Meridian	Piper PA-46-500TP/600TP (PWC PT6)		According to EASA.IM.A.077 max. operating altitude of 30000ft	2a
1	PIPER AIRCRAFT	PA-46-600TP	M600	Piper PA-46-500TP/600TP (PWC PT6)		According to EASA.IM.A.077 max. operating altitude of 30000ft	2a
1	**DAHER AEROSPACE**	TBM 700 N	TBM 850 TBM 900 TBM 930	Socata TBM 700 (PWC PT6)	TC Owner according to TCDS is DAHER AEROSPACE	According to EASA.A.010 max. operating altitude of 31000ft	2a
1	**DAHER AEROSPACE**	TBM 700 A		Socata TBM 700 (PWC PT6)	TC Owner according to TCDS is DAHER AEROSPACE	According to EASA.A.010 with installed OPT70-01-026 max. operating altitude of 31000ft without max. operating altitude of 30000ft	2a
1	**DAHER AEROSPACE**	TBM 700 B		Socata TBM 700 (PWC PT6)	TC Owner according to TCDS is DAHER AEROSPACE	According to EASA.A.010 with installed OPT70-01-026 max. operating altitude of 31000ft without max. operating altitude of 30000ft	2a
1	**DAHER AEROSPACE**	TBM 700 C1		Socata TBM 700 (PWC PT6)	TC Owner according to TCDS is DAHER	According to EASA.A.010 max. operating	2a

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					AEROSPACE	altitude of 31000ft	
1	**DAHER AEROSPACE**	TBM 700 C2		Socata TBM 700 (PWC PT6)	TC Owner according to TCDS is DAHER AEROSPACE	According to EASA.A.010 max. operating altitude of 31000ft	2a

response

Not accepted.

EASA thanks Luftfahrt-Bundesamt for the comments and the elaborate proposals for the reclassification received.
However, at this stage, EASA has decided not to reclassify any aircraft from Group 1 to a different group.
As indicated in 66.A.5, reclassification can only be done on the basis of a lower complexity of the particular aircraft, but at this point in time, there are no objective criteria available to justify a lower complexity of the particular aircraft. In that sense EASA, for next amendment of Part-66, is interested in the criteria that the LBA has applied to identify the aircraft that are proposed for reallocation.
To maintain a level playing field the criteria must be transparent and applied to all aircraft.
EASA understands the difficulties in acquiring the necessary knowledge if there is no Part-147 approved training available, in particular for 'legacy' aircraft. This issue will be addressed also by the upcoming RMT.0255 'Review of Part-66'.
In addition, the regulation provides the means to deal with this situation through a direct approval of a type rating by a competent authority as per 66.B.130.
Last consideration: considering that new aircraft categories will be introduced into the EASA system (e.g. electrical propulsion) and some definitions may disappear or change, it will better to have in place a type rating database structured with a defined taxonomy without exceptions or particular cases.

SUBGROUP 2a: SINGLE TURBO-PROPELLER p. 100-101

comment

3 comment by: *Aerodata AG*

According COMMISSION REGULATION (EU) 2018/1142 Part 66.A.5 the subgroup 2a is for "single turbo-prop-engine-aeroplanes, and those turbojet and multiple-turboprop aeroplanes classified by the Agency in this subgroup because of their lower complexity."
However, to our knowledge, the second paragraph was not applied in this list, because their is no turbojet or twin-/multi- turboprop included at the moment. It seems like all multiple-turboprops continue to belong to group 1.

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	Due to their low complexity, the following aircraft should be added to subgroup 2a: - AIRCRAFT INDUSTRIES Let L-410 series - ASI AVIATION F 406 Series - B-N GROUP Ltd. BN2T Series - MITSUBISHI MU-2B series - PIPER AIRCRAFT PA-42 Series - PIPER AIRCRAFT PA-31 Series - POLSKIE ZAKLADY LOTNICZE M28 - RUAG Aerospace GmbH Dornier 228 - SHORT BROTHERS PLC SC7 Series - SHORT BROTHERS PLC SD3 - TEXTRON AVIATION Inc. 400 Series - TEXTRON AVIATION Inc. 425 - TEXTRON AVIATION Inc. 441 - TEXTRON AVIATION Beech 90 Series - TEXTRON AVIATION Beech 200 Series - TEXTRON AVIATION Beech 300 Series - TWIN COMMANDER 680/ 690 series - VIKING AIR DHC-6 Series (the aircraft Beech 90, Beech 200, Beech 300 could also be combined in a single model series/ training course, since there are only small deviations). In addition there are several single turbo props that still are classified as group 1 aircraft: - PILATUS AIRCRAFT PC-12 series - PIPER AIRCRAFT PA-46-500 series - SOCATA TBM 700 series These models should also be included in subgroup 2a --> All above mentioned models have simple avionics and flight controls, often no pressurized cabin and are often based on models of piston aircraft, so there should be the possibility to summarize them in subgroup 2a.
response	*Not accepted* EASA thanks Aerodata AG for their comments and the proposals for the reclassification received. However, at this stage, EASA has decided not to reclassify any aircraft from Group 1 to a different group. As indicated in 66.A.5, reclassification can only be done on the basis of a lower complexity of the particular aircraft, but at this point in time, there are no objective criteria available to justify a lower complexity of the particular aircraft. In that sense EASA , for next amendment of Part-66 , is interested in the criteria that Aerodata AG has applied to identify the aircraft with lower complexity that are proposed for reallocation. To maintain a level playing field the criteria must be transparent and applied to all aircraft. EASA understands the difficulties in acquiring the necessary knowledge if there is no Part-147 approved training available, in particular for 'legacy' aircraft. This issue will be addressed also by the upcoming RMT.0255 'Review of the Part-66'. In addition, the regulation provides the means to deal with this situation through a direct approval of a type rating by a competent authority as per 66.B.130.

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Last consideration: considering that new aircraft categories will be introduced into the EASA system (e.g. electrical propulsion) and some definitions may disappear or change, it will better to have in place a type rating database structured with a defined taxonomy without exceptions or particular cases.
Regarding the proposal to combine the TR for the Beech models, a change in this direction shall be supported and justified by the manufacturer.

The mentioned single turbo-propeller aircraft that are still listed in Group 1 are there because they were certified to operate beyond flight level 290

SUBGROUP 2c: SINGLE PISTON-ENGINE HELICOPTERS p. 107-108

comment *4* comment by: *Specialist Aviation Services Belgium*

Attachment #1

269A/269B/269C/269C-1 TC Holder is no longer Sikorsky Aircraft Corporation. Since January 2018, Schweizer RSG LLC is the TC holder for TCDS 4H12, so the type rating endorsement should no longer refer to 'Sikorsky' but to 'Schweizer'

response *Accepted.*

GROUP 3: PISTON-ENGINEAEROPLANES (other than those in Group 1) p. 109-147

comment *18* comment by: *Romanian CAA*

The type of structure of the ZLIN-TOMTC Holder: ZLIN AIRCRAFT (MORAVAN AVIATION) is considered "Metal" and the type of structure of MAULE TOMTC Holder - MAULE AEROSPACE TECHNOLOGY is considered "Metal tubing Fabric".
EASA confirmed for a Romanian organization that the structure of the Zlin 526 and Zlin 726 is similar to the structure of the MAULE M7-235C.
We ask for a review in respect of ZLIN and MAULE aircraft.

response *Accepted.*

GROUP 4 SAILPLANES p. 152-159

comment *16* comment by: *Luftfahrt-Bundesamt*

The list itself currently contains multiple mistakes in the Group 4. One of the main issues is that many sailplanes and powered sailplanes are in the wrong section:

Current List	Correct List	TC Holder	Model	Type of structure	Note
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	AEROCLUBUL ROMANIEI	IS-28M2	Metal	Powered

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GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	AEROCLUBUL ROMANIEI	IS-28M2/80HP	Metal	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	AEROCLUBUL ROMANIEI	IS-28M2/G	Metal	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	AEROCLUBUL ROMANIEI	IS-28M2/GR	Metal	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASH 25 E	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASH 25 M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASH 30 Mi	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASK 21 Mi	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASW 22 BE	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASW 22 BLE	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASW 22 BLE 50R	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASW 22 M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASW 27-18 E	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-1000M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-1000T	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-400	*Composite*	Powered

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GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-500 M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-500 MB	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-600/18 M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-600M	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-800 A	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-800 B	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-800 LA	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	DG-808 C	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	LS10-st	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	DG FLUGZEUGBAU GMBH	LS8-t	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	HPH SPOL SRO	Glasflügel 304 eS	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	HPH SPOL SRO	Glasflügel 304 MS	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	SPORTINE AVIACIJA IR KO	LAK-19T	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	WITHOUT TC HOLDER - ORPHANED	PIK 20 E II F	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	WITHOUT TC HOLDER - ORPHANED	PIK 30	*Composite*	Powered

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GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	WITHOUT TC HOLDER - ORPHANED	PIK-20 E	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	WITHOUT TC HOLDER - ORPHANED	PIK-20 E II	*Composite*	Powered
GROUP 4 SAILPLANES	GROUP 4 POWERED SAILPLANES	ZAKLAD SZYBOWCOWY JEZOW	SZD-45A 'Ogar'	*Composite*	Powered

response *Accepted.*

The list will be corrected.

GROUP 4 POWERED SAILPLANES p. 160-162

comment *17* comment by: *Luftfahrt-Bundesamt*

GROUP 4 POWERED SAILPLANES	GROUP 4 SAILPLANES	ALEXANDER SCHLEICHER	ASG 32	*composite*	Non powered
None	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASG 32 MI	*composite*	**Missing in TR List**
None	GROUP 4 POWERED SAILPLANES	ALEXANDER SCHLEICHER	ASK 21 B	*composite*	**Missing in TR List**
GROUP 4 POWERED SAILPLANES	GROUP 4 SAILPLANES	SCHEMPP HIRTH FLUGZEUGBAU	Arcus	*composite*	Non powered
GROUP 4 POWERED SAILPLANES	GROUP 4 SAILPLANES	SCHEMPP HIRTH FLUGZEUGBAU	Nimbus-4	*composite*	Non powered
GROUP 4 POWERED SAILPLANES	GROUP 4 SAILPLANES	SCHEMPP HIRTH FLUGZEUGBAU	Nimbus-4D	*composite*	Non powered
GROUP 4 POWERED SAILPLANES	GROUP 4 SAILPLANES	SPORTINE AVIACIJA IR KO	LAK-17A	*composite*	Non powered

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None	GROUP 4 POWERED SAILPLANES	Binder Motorenbau GmbH	EB29R	*composite*	**Missing in TR List**

response *Accepted.*

Appendix A - Attachments

4H12_Rev_31.pdf

Attachment #1 to comment #4

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