



European Aviation Safety Agency
Comment-Response Document 2016-20

Appendix
to ED Decision 2017/016/R

RELATED NPA 2016-20 — RMT.0541 — 1 JUNE 2017

Table of contents

1. Summary of the outcome of the consultation	2
2. Individual comments and responses	3
3. Appendix A - Attachments	16



1. Summary of the outcome of the consultation

There were 34 comments on the NPA made by 18 users. All comments have been responded as follows:

- Accepted: 19
- Partially accepted: 5
- Noted: 8
- Not accepted: 2



2. Individual comments and responses

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

- (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.

(General Comments)	-
---------------------------	---

comment	9	<p style="text-align: right;">comment by: <i>UK CAA</i></p> <p>Thank you for the opportunity to comment on NPA 2016-20 - Appendix 1 - Aircraft type ratings for Part-66 aircraft maintenance licence.</p> <p>Please be advised that there are no comments from the UK Civil Aviation Authority.</p>	
response	<i>Noted.</i>		
comment	10	<p style="text-align: right;">comment by: <i>Swedish Transport Agency</i></p> <p>No comments!</p>	
response	<i>Noted.</i>		
comment	23	<p style="text-align: right;">comment by: <i>Luftfahrt-Bundesamt</i></p> <p>LBA general comments:</p> <p>The LBA appreciates and welcomes the new list. The alignment with the EASA Product List will now be more congruent. However thought should put into the question, if a delay in the publication of the type rating list in order to await the changes in the handling of the aircraft groups proposed in the EASA Opinion 05/2015.</p> <p>Several formatting issues present in the NPA are not optimal: There are cells of the tables divided between the pages (Examples on Page 24 to 25 and 25 to 26), while those pose no issue, they are proving a hassle for readers not used to handle the type rating list (Such an issue could be prevented by the switching off the option "Allow row to break across pages" in the table properties).</p> <p>Some of the formatting is as well sacrificing readability for those who are not commonly using the list. This concerns mainly the decision to list the rating endorsement for each model a new instead of merging those cells as was done till now, this seems a step</p>	

backwards.

Some changes in the table have not been properly marked (an example may be found on page 107: White box "TEXTRON AVIATION Inc."), the same applies to some deletions (an example may be found on page 23: Aircraft Model "A100C).

In some instances the descriptions of the legal form of the companies (TC-Holders) according the TCDS are not correct (such as "Air Tractor Inc.", "BELL HELICOPTER TEXTRON Inc." or "RUAG Aerospace Services GmbH").

Suggestion for improvement: In the column "note" there is sometimes the entry "Annex II a/c". It would be better if it is additionally mentioned the country of the respective Annex II.

Concerning commercially used Annex II aircraft which occasionally feature on Part-66 licences with the acceptance of EASA (due to their need for an AOC and Part-145), those types should be included in the list (such as the "McDouglas DC-3 (PW R1830)", "Junkers Ju-52 (BMW 132)" or the "Lockheed Super Constellation (Curtiss-Wright R3350)").

The doubling such as in the case of Cessna ratings in the list such as the "Cessna/Reims-Cessna 172/F172 Series (Continental)" for TC Holder CESSNA AIRCRAFT Company and the TEXTRON AVIATION Inc. is just confusing. This is handled in the current type rating list much better.

The row "Commercial Designation" should if possible be added to Group 3 where it is more often used to reference to aircraft than in Group 1 and Group 2.

response *Partially accepted.*

Noted. This TR list considers the current a/c groups classification. When EASA Opinion 05/2015 will be **accepted** by Commission, the TR list will be revised accordingly taking into account new license categories and a/c groups.

Accepted. Page layout will adopt the proposed format settings.

Not Accepted. Having a unique correlation between the model and the related type rating endorsement, without merging the cells, is consistent with EASA's database.

Accepted. Corrections will be made accordingly.

Accepted. Corrections will be made accordingly.

Not Accepted. In order to avoid misunderstandings, the entry 'Annex II a/c' will be removed by the NOTE field. EASA keeps the TR for 'Agusta AB206/Bell 206 (RR Corp 250)' only for historical reasons.

Not Accepted. Annex II a/c are out of the scope of Part-66 list, therefore, the mentioned a/c will not be included.

Not Accepted. The list is consistent with the TCH names reported into the current EASA product database.



Noted. Due to lack of space, the 'Commercial Designation' filed has been considered in the Group 3. It is not excluded that, in the future, an improved table layout could include also this information.

comment

33

comment by: DGAC France

DGAC France thanks the Agency for this NPA. The last voted amendment to Regulation (EU) n°1321/2014 does include the following text (in 66.A.5) :

"*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, [gas airships above ELA2](#) and other aircraft requiring an aircraft type rating when defined so by the Agency.

The Agency may decide to classify into Group 2, 3 or 4 an aircraft which meets the conditions above, if justified by its lower complexity."

Given the above, DGAC France is wondering if a new Type Rating list for Part 66 licences will be then proposed ? DGAC France believes that several types of GA aeroplanes could benefit of this change.

response

Noted.

These foreseen provisions have not yet been accepted, they are waiting the endorsement of Opinion 05/2015 by the EC.

Once these provisions are endorsed, EASA will consider the mechanism how to manage the 'declassification' of such aircraft which is part of RMT.0255.

comment

36

comment by: ECOGAS

The classification for aircraft in group1 we do not address **except** that with introduction of groups 1-3, SME's, mainly the bigger ones but still SME's according EU definition, have been heavily and negatively affected by stringent requirements for type ratings limited to Part 147.

Before EASA, SME maintenance organisations had the possibility to train their staff to TR level either in-house or at the manufacturer, or supported by the manufacturer. In-house TR were possible if the SME had the competence and experience to provide such training.

This was changed not based on (accident data) but based either on the impression of the necessity or on single occurrences or accidents without statistical relative data.

Its an undue and unnecessary burden for SME's active in maintenance not justified by impact assessments, as this did not (and sometimes still does not) exist in an appropriate manner.

It has brought and still brings many SME's to the limit of it's very economical survival, which in itself is for sure detrimental to safety.

The situation is such that TR business on the middle segment type of aircraft may be not very economical interesting unless it's hardly affordable.



The shift from in-house TR from competent SME's to the part 147 on this segment did not help either of them; the allowance for one of courses within Part 145 is very unhelpful.

We urge EASA to reconsider the present approach for aircraft below 18 Pax and come to solutions which are promoting SME's active in CAT.

The regulation, most probably appropriately adapted to airline type maintenance, is not proportionate to the SME environment and it needs better solution. All the effort, time and money SME's are investing in having their organisations and their staff properly licensed or approved are badly honoured.

In this respect EASA has created a bad environment for those living in and from maintenance, trying to create and maintain job and are pushed into a dramatic situation.

We hope that the progress underway in the leisure sector (which EASA calls GA, but it is not) find it's way soon into the middle segment, CAT non airlines, non mass transport, the area still most badly affected by the current regulation.

response *Noted.*

These concerns have been already identified by EASA and will be addressed in RMT.0255.

Executive Summary

p. 1

comment 31 comment by: *IACA International Air Carrier Association*

IACA has no comments to NPA 2016-20.

Erik Moyson
SSCC member

response *Noted.*

2. In summary—why and what - Overview of the proposed amendments

p. 4-12

comment 35 comment by: *EUROCONTROL*

2.3 Overview of the proposed amendments

c.1.: typo spotted, please change type rating into type rating

response *Accepted.*

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - A. GROUP 1 AEROPLANES

p. 16-51



comment	<p>1</p> <p>Attachments #1 #2</p> <p>Dear Sir</p> <p>With the recent changes to the EASA 66 B2 Licence the list of types in appendix I is to restrictive and I shall demonstrate with my case if I may.</p> <p>I hold a full EASA 66 B1 and B2. I hold many type ratings but two in particular are causing me problems (I am not alone).</p> <p>I hold Boeing 757-200/300 RB211 B2 and Boeing 767-200/300 CF6 and JT9 B2.</p> <p>Unfortunately I DON'T hold engine types PW2000 and PW4000 respectively.</p> <p>The result of this is that I cannot certify ANT ASPECT of aeroplanes that have PW2000 or PW4000 engines fitted regardless of the fact that there is no B2 involvement on those engines.</p> <p>Would it be possible to add something to say that a B2 engineer could certify these aircraft types with the exception of Aircraft/Engine interfaces?</p> <p>At present to get PW2000 or PW4000 added to a basic course for a B2 would involve 1 day of theory and up to 2 days of practical regardless of the fact there is next to no B2 involvement on the engine.</p>	comment by: <i>Barry Lewis</i>
response	<p><i>Noted.</i></p> <p>EASA is aware of this issue, but the current rules of Part-66 do not allow to fix these cases. Your concerns and observations have been forwarded to the colleagues in charge of the RMT.0255, a rulemaking task which aims to identify and solve the areas of the Part-66 which need improvements.</p>	
comment	<p>2</p> <p>The Airbus A330 (RR Trent 700) is missing</p>	comment by: <i>Alan Roper</i>
response	<p><i>Accepted</i></p> <p>TR with Trent 700 have been erroneously deleted and will be restored.</p>	
comment	<p>3</p> <p>add Sukhoi long range variant (SSJ100LR ??)</p>	comment by: <i>Bram van Driel</i>
response	<p><i>Not accepted.</i></p> <p>This variant is not in the EASA current product list.</p>	

comment 4 comment by: *Bram van Driel*

Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)

response *Accepted.*

TRs will be amended as proposed by Bombardier:

Model	Commercial Designation	Part-66 Type rating endorsement
CL600-1A11 (600)	Challenger 600	Bombardier CL-600-1A11 (Honeywell ALF502)
CL-600-2A12 (601 Variant)	Challenger 601	Bombardier CL-600-2A12/2B16 (601/601-3A/3R Variant) (GE CF34)
CL-600-2B16 (601-3A Variant)	Challenger 601-3A	Bombardier CL-600-2A12/2B16 (601/601-3A/3R Variant) (GE CF34)
CL-600-2B16 (601-3R Variant)	Challenger 601-3R	Bombardier CL-600-2A12/2B16 (601/601-3A/3R Variant) (GE CF34)
CL-600-2B16 (604 Variant)	Challenger 604 (MSN < 5701) Challenger 605 (5701<=MSN <= 5990) Challenger 650 (MSN ≥ 6050)	Bombardier CL-600-2B16 (604 Variant) (GE CF34)
CL-600-2B16 (CL-604 Variant)	Challenger 604 (MSN < 5701) Challenger 605 (MSN > 5701)	Deleted
CL-600-2B19 (RJ Series 100)	Regional Jet Series 100/200/440/Challenger 850/CRJ SE	Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)
CL-600-2C10 (RJ 700/701/702)	Regional Jet Series 700/701/702	Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)
CL-600-2D15 (RJ Series 705)	Regional Jet Series 705	Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)
CL-600-2D24 (RJ Series 900)	Regional Jet Series 900	Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)
CL-600-2E25 (RJ Series 1000)	Regional Jet Series 1000	Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)

comment 5 comment by: *Bram van Driel*

Bombardier CL-600-2A12/2B16 (variant CL 601/601-3A/3R) (GE CF34)

response *Accepted.*

See comment #4.



comment	<p>6 comment by: <i>Bram van Driel</i></p> <p>Bombardier CL-600-2B19/2C10/2D15/2D24/2E25 (GE CF34)</p>														
response	<p><i>Accepted.</i></p> <p>See the response to comment #4.</p>														
comment	<p>11 comment by: <i>RECCHIA Giuseppe Guido</i></p> <p>Cessna 500 (PWCJT15D) and Cessna 501 (PWCJT15D) refer to different FAA and EASA TCDS respectively A22CE/IM.A.207 A27CE being the first one a Large Aeroplanes and the second a Small Aeroplanes</p> <p>Consequently it would be better to have two separate aircraft type endorsements for those models. Alternatively to replace Cessna 551 model with 500 model under rating Cessna 550/551/560 (PWC JT15D) which therefore becomes Cessna 500/550/560 (PWC JT15D), and replace Cessna 500 model with 551 model under rating Cessna 500/501 (PWC JT15D) which therefore becomes Cessna 501/551 (PWC JT15D)</p>														
response	<p><i>Accepted.</i></p>														
comment	<p>13 comment by: <i>EMS</i></p> <p>The Part-66 type rating endorsement for Textron aviation Inc Cessna 525B (williams FJ44) should be merged with Cessna 525/525A (Williams FJ44). All of these aircraft types are classified as complex motor-powered aircraft and the difference between a Cessna 525B and 525A+ is negligible. (There are more differences between an old Cessna 525 and 525A+ which already are within the same type rating endorsement.)</p> <p>The Cessna 525C should remain a separate type rating endorsement since the aircraft systems differs a lot from the Cessna 525/525A/525B.</p>														
response	<p><i>Accepted.</i></p>														
comment	<p>15 comment by: <i>FALCON in the AIR</i></p> <p>Please don't forget the new commercial designation of the TBM 930 for the Socata Airplane (TBM 700 N) This Trade name "TBM930" is named in the TCDS ref. EASA.A.010.</p> <p>Thank you in advance Kind regards</p>														
response	<p><i>Accepted.</i></p> <p>TBM930 will be added.</p>														
comment	<p>19 comment by: <i>AIRBUS</i></p> <p>For the Airbus A320 family, please modify as indicated below</p> <table border="1" data-bbox="359 1973 1481 2018"> <thead> <tr> <th>TC</th> <th>Model</th> <th>Common</th> <th>Part-66</th> <th>Type</th> <th>rating</th> <th>Note</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	TC	Model	Common	Part-66	Type	rating	Note							
TC	Model	Common	Part-66	Type	rating	Note									

Holder		designation	endorsement	
AIRBUS	A321-251N	A321 NEO	Airbus A319/A320/A321 (CFM LEAP-1A)	TC 02/2017
AIRBUS	A321-253N	A321 NEO	Airbus A319/A320/A321 (CFM LEAP-1A)	TC 02/2017
AIRBUS	A321-272N	A321 NEO	Airbus A319/A320/A321 (IAE PW 1100G)	TC 02/2017
AIRBUS	A321-271N	A321 NEO	Airbus A319/A320/A321 (IAE PW 1100G)	TC not yet released (TC released in December 2016)
AIRBUS	A320-273N	A320 NEO	Airbus A319/A320/A321 (IAE PW 1100G)	TC not yet released

response *Accepted.*

comment 20 comment by: AIRBUS

Attachment [#3](#)

For the Airbus A330 Family , please modify as proposed in the attachment

response *Partially accepted.*

See the response to comment #2.

comment 21 comment by: AIRBUS

For the A330 family, please add the following models in certification process:

TC Holder	Model	Common designation	Part-66 Type rating endorsement	Note
AIRBUS	A330-841	A330 NEO	Airbus A330 (RR Trent 7000)	TC not yet released
AIRBUS	A330-941	A330 NEO	Airbus A330 (RR Trent 7000)	TC not yet released
AIRBUS	A330-743L	Beluga XL	Airbus A330 (RR Trent 772)	TC not yet released

response *Accepted.*

comment 22 comment by: Gulfstream Aerospace Corporation



	<p>Attachment #4</p> <p>Correct TC Holder by removing the words "c/o Israel Aircraft Industries" for 1125, G100, G200, G150 and G280.</p> <p>Correct Model and Common Designators as follows:</p> <table border="1"> <thead> <tr> <th>Model</th> <th>Common Designator</th> </tr> </thead> <tbody> <tr> <td>1125 Westwind Astra</td> <td>Astra</td> </tr> <tr> <td>Gulfstream 100/Astra SPX</td> <td>G100/Astra SPX</td> </tr> <tr> <td>Gulfstream 200/Galaxy</td> <td>G200/Galaxy</td> </tr> <tr> <td>Gulfstream G150</td> <td>G150</td> </tr> <tr> <td>Gulfstream G280</td> <td>G280</td> </tr> </tbody> </table>	Model	Common Designator	1125 Westwind Astra	Astra	Gulfstream 100/Astra SPX	G100/Astra SPX	Gulfstream 200/Galaxy	G200/Galaxy	Gulfstream G150	G150	Gulfstream G280	G280
Model	Common Designator												
1125 Westwind Astra	Astra												
Gulfstream 100/Astra SPX	G100/Astra SPX												
Gulfstream 200/Galaxy	G200/Galaxy												
Gulfstream G150	G150												
Gulfstream G280	G280												
response	<i>Accepted.</i>												

comment	<p>24</p> <p>comment by: <i>Luftfahrt-Bundesamt</i></p> <p>LBA proposed amendments:</p> <p>Page 22: According to TCDS EASA.IM.A.073, TC Holder of Aircraft Model “390 (Premier I)” and “390 (Premier IA)” is the Raytheon Aircraft Company</p> <p>Page 24: Double entry of Boeing Model 720, but Model 720B according to the EASA Product List is missing.</p> <p>Page 49: “Chancellor” not “Chencelor”; what is “Lminer”?</p>
response	<p><i>Accepted.</i></p> <p>TCH name will be corrected to ‘RAYTHEON AIRCRAFT COMPANY’.</p> <p>Typo error to be corrected and Model 720B to be added.</p> <p>Typo error corrected into Chancellor.</p> <p>Typo error corrected into ‘Businessliner Utiliner’.</p>

comment	<p>30</p> <p>comment by: <i>FlightSafety International</i></p> <p>Gulfstream Aerospace GVI (650). Change Comm. Design to G650/G650ER.</p>
response	<i>Accepted.</i>

comment	<p>32</p> <p>comment by: <i>DGAC France</i></p> <p>DGAC France agrees with the inclusion of the Falcon 8X type rating within the Falcon 7X type rating. However, the mentioned type is different than the current one in the Appendix I. For consistency reasons, "PWC" should be included in the type rating : "Falcon 7X (PWC PW307)"</p>
---------	---

response *Not accepted.*

This new TR endorsement has been defined and agreed between EASA and Dassault Aviation within the OSD approval process.

Furthermore, following the analysis and the justification provided by Dassault Aviation (ref. DGT159008 iss.1), EASA agrees that **Falcon 900EX** is to be considered as a variant of the Mystere **Falcon 900C**, therefore, the two models will share the same TR endorsement: **Falcon 900C/EX (Honeywell TFE 731)**.

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - C. GROUP 1 HELICOPTERS

p. 53-58

comment 16 comment by: *FALCON in the AIR*

Please take into account the new name of Safran Helicopter Engines (formerly Turboméca). The name have been changed on yours TCDS for all engines.

response *Noted.*

As a general policy, EASA keeps the original/traditional names in the TR endorsement, otherwise the frequent change of the TCH's name can generate confusion and misunderstandings once the TR is endorsed on the AML.

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - E. SUBGROUP 2a: SINGLE TURBO-PROPELLER ENGINE AEROPLANES

p. 60-61

comment 25 comment by: *Luftfahrt-Bundesamt*

LBA proposed amendments:

Page 60 & 70: According to the EASA Product List the model is "G-164D with 73'' wing gap". (not [...]73' wing gap)

Page 61: What about the Aircraft "SST Flugtechnik GmbH" Model "EA 400" according to EASA Product List and the TCDS? (this model is missing)

response *Accepted.*

The typing error will be corrected.

Model EA 400 will be added into Group 3 table with TR 'Extra EA-400 (Continental)'.

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - G. SUBGROUP 2b: SINGLE TURBINE ENGINE HELICOPTERS (Other than those in Group1)

p. 63-65

comment 17 comment by: *FALCON in the AIR*

Please take into account the new name Safran Helicopter Engines instead of Turboméca. EASA TCDS have been changed in august 2016.

response *Noted.*
See the response to comment #16.

comment 26 comment by: *Luftfahrt-Bundesamt*
LBA proposed amendments:
Page 65 & 66: According to the EASA Product List the TC-Holder for Model 269A, 269B, 269C, 269C-1 & 269D is “Sikorsky Aircraft Corporation”.

response *Accepted.*
TCH changed to ‘Sikorsky Aircraft Corporation’.

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - H. SUBGROUP 2c: SINGLE PISTON-ENGINE HELICOPTERS (Other than those in Group1)

p. 66-67

comment 27 comment by: *Luftfahrt-Bundesamt*
LBA proposed amendments:
Page 65 & 66: According to the EASA Product List the TC-Holder for Model 269A, 269B, 269C, 269C-1 & 269D is “Sikorsky Aircraft Corporation”.

response *Accepted.*
See the response to comment #26.

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - I. GROUP 3: PISTON-ENGINE AEROPLANES (Other than those in Group 1)

p. 68-113

comment 8 comment by: *Urząd Lotnictwa Cywilnego Poland*
The PWC PT6 engine is a turbine engine (not a piston-engine).

response *Accepted.*
AIR TRACTOR TR ‘Air Tractor AT-400/500/600 Series (PWC PT6)’ will be transferred in SUBGROUP 2a.

comment 14 comment by: *CAA-NL*
In both subgroup 2A en group 3 the Air Tractor AT-400/500/600 (PWC PT6) type rating endorsement is added. This does not seem consistent since group 3 consists of piston-engine aeroplanes and the PT6 is a turbo-propellor aeroplane.

response *Accepted.*



See the response to comment #8.

comment	<p>18 comment by: <i>FALCON in the AIR</i></p> <p>It's missing the aircraft under Socata SAS EASA.SAS.A.075 : - Gardan GY80 Horizon : GY80-150/GY80-160/GY80-150D/GY80-160D/GY80-180 and Socata SAS EASA.SAS.A.116 : - SOCATA Rallye 235 CA and CA-M</p>
response	<p><i>Partially accepted.</i></p> <p>Gardan (Aircraft with SAS) GY80 Series is already in the GROUP 3 tables with TR Gardan GY 80 (Lycoming).</p> <p>SOCATA Rallye 235 CA and CA-M will be added to the list as: SOCATA (Aircraft with SAS), RALLYE 235 CA and CA-M, TR SOCATA Rallye Series (Lycoming).</p>
comment	<p>28 comment by: <i>Luftfahrt-Bundesamt</i></p> <p>LBA proposed amendments:</p> <p>Page 68: According to the EASA Product List the name of the TC-Holder is “CEARP” instead of “AERODIF”.</p> <p>Page 69: According to the EASA Product list and the respective TCDS the TC Holder of the model LA-4-200 is “REVO.INC”. The TC-Holder of Lightwing AC-4 is “Light Wing AG” (according to EASA Product List and TCDS)</p> <p>Page 71: Model 7ECA (American Champion Aircraft Corp.): Different engine type in EASA Product List.</p> <p>Page 77: What about “BRITTEN-NORMAN AIRCRAFT LTD.” models BN2T,-2,-2R, -4R, -4S according to the EASA Product list?</p> <p>Page 79: According to the EASA Product list the TC-Holder for the models LC40-550FG, LC41-550FG & LC42-550FG is “Textron Aviation Inc.”.</p> <p>Page 93: Three times the same entry without that a difference is recognizable: Piper Aircraft Model PA-28-161.</p> <p>Page 95: The model PZL-M-20 is not in the EASA Product List.</p> <p>Page 60 & 70: According to the EASA Product List the model is “G-164D with 73’’ wing gap”. (not [...]73’ wing gap)</p>
response	<p><i>Partially accepted.</i></p> <p>Page 68: AERODIF will be changed into CEAPR.</p> <p>Page 69: TCH will be changed into REVO, INC.</p>



Page 71: TR changed into Champion 7 (Lycoming)

Page 77: They are in Group 1 tables as bi-turboprop.

Page 79: TCH will be changed to 'Textron Aviation Inc.'

Page 93: Mistaken entries will be deleted.

Page 95: The model PZL-M-20 is in the EASA Product List WITHOUT TC HOLDER - ORPHANED.

Page 60 & 70: See Comment #25.

comment

34

comment by: *DGAC France*

The Piper PA-23 Aztec (PA E23-250) has been included in the Group 3 with a MTOM of less than 2T. However, the current TCDS for this aircraft is mentioning a MTOM of 4800 lbs (around 2150 kg). As a consequence, the aircraft should be classified above 2T and shall be subjected to a B1.2 licence instead of a B3.

response

Accepted

MTOM will be set >2T

3.1. Draft AMC/GM - Aircraft type ratings for Part-66 AML - J. STCs in GROUP 3 AEROPLANES

p. 114-118

comment

29

comment by: *Luftfahrt-Bundesamt*

LBA proposed amendments:

Page 114: The Name is "Robert" instead of "Ropert".

Page 114 - 118 STC-Table Group 3: Missing reference of non-EASA STCs

response


Partially accepted.

The typing error will be corrected.

STC reference is missing because EASA has not received all the information concerning the STCs that have been previously approved by Member States.



3. Appendix A - Attachments

 [NPA 2016-20 18.pdf](#)

Attachment #3 to comment [#20](#)

 [Pages from NPA 2016-20-GALP Comments Feb 2017.pdf](#)

Attachment #4 to comment [#22](#)

