

Comment				Comment summary	Suggested resolution	Comment is an observation (suggestion)	Comment is substantive (objection)	EASA comment disposition	EASA response
NR	Author	Section, table, figure	Page						
1	CAA UK			No comments				Noted	The Agency is acknowledging the “no comment” feedback from UK CAA. No change in the Proposed CM text.
2	Dassault Aviation	All	All	<p>General</p> <p>Dassault-Aviation are concerned about using the formalism of a CM for a non-published CS.</p> <p>The intent of this CM is clearly to act as a substitute of the non-published CS-MCSD.</p> <p>A CM is a non-binding material that only aims to provide information and guidance at a lower level than an AMC or GM, therefore it cannot be used to set the basis of the contents of a future Special Condition that will be associated to requirements which are currently not applicable since not yet published.</p> <p>Indeed a CM should only be issued to clarify published and applicable requirements, and/or related AMC or GM.</p> <p>Dassault-Aviation had volunteered some years ago to be involved in the EASA Working Group that would resume the charge of defining the CS-MCSD, and repeat their regrets that the CSMCSD will be issued so late.</p> <p>As a reminder, EASA definition for a CM:</p> <p><i>EASA Certification Memoranda (CM) clarify the Agency’s general course of action on specific certification items. They are intended to provide guidance on a particular subject and, as nonbinding material, may provide complementary information and guidance for compliance demonstration with current standards. Certification Memoranda are provided for information purposes only and must not be misconstrued as formally adopted Acceptable Means of Compliance (AMC) or Guidance Material (GM). Certification Memoranda are not intended to introduce new certification requirements or to modify existing certification requirements and do not constitute any legal obligation.</i></p>				Noted	<p>Whilst the overall comment disposition is resumed by “Noted”, there are a few elements that EASA would like to underline:</p> <ol style="list-style-type: none"> DA’s approach to submit the comments to the Proposed CM only in a format tailored to its own organisation (i.e. the letter DGT-DTC 368392) and ignore the format recommended by the Agency (see http://www.easa.europa.eu/documents/public-consultations/proposed-cm-mcscd-001), coupled with the approach of grouping several comments under a single identification number, raised some comment processing and responding difficulties. This approach forced the Agency to elaborate in its response on different comments under one “comment disposition” although that comment disposition was not applicable to all the comments received from DA under the single identification number (see below, in this CRD table, the comment response Nr. 1,5,8). For the purpose of improving the clarity of the opening statement in paragraph 1.1, the Agency revised the wording by replacing “...specific guidance for compliance with certification requirements...” with “...specific guidance related to the establishment of the OSD certification basis...”. The proposed CM is intended to help the applicants for a TC in anticipating the specifications that may be applicable for the approval of the maintenance certifying staff data. The EASA definition of a CM is acknowledged on the front page of this CM, which further re-enforces its non-binding nature This CM is construed by the Agency as presenting “considerations ...regarding EASA’s approach in preparation of the Special Conditions” (see 1.1) and not as “the basis of the contents of a future Special Condition” (as stated by DA). . Therefore the content of this CM is in line with the mentioned definition. In this context, the DA comment is not appropriate. <p>The Proposed CM text was changed as highlighted above in point 2.</p>
3	Dassault Aviation	1.2		<p>References</p> <p>Date for "ED decision 2014/007/R" is "31.01.2014".</p>				Accepted	The Proposed CM text was changed by correcting the date accordingly.

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4	Dassault Aviation	1.4		<p>Definitions</p> <p>Regarding the meaning of "a/c configuration", the proposed definition "The configuration of the respective aircraft as defined by type" would gain to be replaced by</p> <p>"The configuration of the respective aircraft <u>as certified by the Type Design</u>".</p>				Partially accepted	<p>The Agency considers that a TC issued to an a/c is approving the type design of the aircraft. Thus, the definition wording stating: "The configuration of the respective aircraft as defined by type design", was replaced with the wording: "The configuration of the respective aircraft as defined by the approved type design".</p> <p>The Proposed CM text was changed as highlighted above.</p>
5	Dassault Aviation	2		<p>Background</p> <p>Dassault-Aviation consider that the wording "Minimum syllabus of MCS Type Rating training" from Part 21.A.15.(d)(3) is ambiguous and should be changed/explained in the CM by "TCH minimum requirements for MCS Type Rating training". This wording better reflects the spirit of the OSD.</p> <p>Indeed the TCHs are responsible for defining the aircraft and associated documentation. We, as TCH, cannot be held responsible for defining training courses contents. With the OSD regulations, we will have to provide Operators/Training Organisations with the "Type specific" inputs that are necessary to complement the general Part66 requirements for training.</p> <p>Through the "Overall OSD" process the TCHs is responsible to define (notably) the TASEm, while the Operator/Training Provider remains responsible for defining the training course content depending on the inputs that are in accordance with Part 66, Appendix III and (future) related Part 21 hook.</p> <p>The Training Providers have a great deal of knowledge and experience developing course content from objectives. They have many years of experience gathering and building course contents which might not be the case for TCHs.</p>				Noted	<p>Whilst the overall comment disposition is resumed by "Noted", there are a few elements that EASA would like to underline:</p> <ol style="list-style-type: none"> 1. This CM is neither the tool nor the place to "change" the wording of Part-21. The Agency agrees, nevertheless, with the fact that the MCSD is capturing the minimum requirements of the TCH for the respective type rating training of MCS. 2. It is the Agency view that, through the OSD-MCSD, the TCH is expected to provide more type specific information than the TASEm (e.g. propose a type rating, identify the base-line from which the minimum requirements set was built). 21.A.15 (d)3 calls for the minimum syllabus of MCS type rating training, including determination of type rating and therefore not only the TASEm. 3. The EASA approach of the OSD-MCSD makes a clear distinction between the type training course content (which is part of the type training course approval, and, thus, a Part-147 organisation obligation) and the minimum syllabus of MCS type rating training (which is a TCH Part-21 organisation obligation). 4. At the moment of writing this EASA response, there is no published Part-66 Appendix III amendment to create the obligation of using the OSD-MCSD. Such an amendment will be adopted and published in the immediate future as part of (EC) No.2042/2003 "recasting". <p>No change in the Proposed CM text.</p>
6	Dassault Aviation	3.1		<p>EASA policy</p> <p>Dassault-Aviation indeed understand the need of deeply involving the EASA in voluntary OSD MCS projects before applying for an extension of their scope of current DOA privilege.</p> <p>We do hope that the subjects on which we are currently working on together (F2000EX series, F2000 HUD Fleetwide, F8X, and soon F5X) will bring enough elements and confidence in appropriate time, ideally before the DOA extension date, i.e. the 18-Dec-2015.</p>				Noted	<p>The Agency acknowledges and appreciates the DA understanding, acceptance and commitment.</p> <p>No change in the Proposed CM text.</p>

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7	Dassault Aviation	3.2		<p>Type Rating Determination</p> <p>Since application for OSD MCS certification is only voluntary pending the issuance of the CS-MCSD, it must be made clear that the way of defining the MCS Type Rating will be the same than today.</p> <p>This way shall be equally applied to all TCHs, regardless of the fact they have applied for OSD MCS or not.</p>				Not accepted	<p>The obligations with respect to application for OSD-MCSD are clearly stated in (EU) No 69/2014 in Article 2. The Agency intends to use the Special Conditions as per 21.A.16B to enable compliance with 21.A.17B(a)2. until the time of CS-MCSD adoption and publication. Thus, the DA comment stating that: "...application for OSD MCS certification is only voluntary pending the issuance of the CS-MCSD ..." is not acceptable.</p> <p>The determination of the Part-66 type rating endorsement (see Appendix 1 to AMCs in Part-66) will be done following the operational evaluation of the TCH proposal per OSD-MCSD requirements. Whilst the evaluation criteria will have a high commonality with the rationale used today, it is a new process. The DA comment stating that: "it must be made clear that the way of defining the MCS Type Rating will be the same than today" is not acceptable.</p> <p>One of the Agency tasks is to make sure that all the TCHs are subjected to an equal playing field in their compliance with the BR and/or IR, and the OSD-MCSD is, obviously, included in the scope of this task.</p> <p>No change in the Proposed CM text.</p>

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8	Dassault Aviation	3.3		<p>Minimum Syllabus content</p> <p>Box 1 / Aircraft configuration</p> <p>Dassault-Aviation consider that reference to the configuration "as certified by the Type Design" is sufficient. Even more, options may be included in this configuration -as it is done so for the already published OSD FC-. There is no need to impose detailing the aircraft configuration down to the ATA (sub)system.</p> <p>This being said, Dassault-Aviation understand and support the need to detail the "TCH minimum requirements for MCS Type Rating training" -i.e the Type-specific items identified as inputs for training- to the adequate level of detail, including associated aircraft configuration environment, in order to allow their correct understanding.</p>				Partially accepted	<p>Whilst the overall comment disposition is resumed by "Partially Accepted", there are a few elements that EASA would like to underline:</p> <ol style="list-style-type: none"> 1. The Agency considers that the aircraft configuration (based on the definition in CM chapter 1.4.) with relevance to maintenance type training should be clearly listed in Box1. This could be a subset of the type design defined configuration, it is considered as a distinct entity which is specific to OSD-MCSD and should be clearly listed here. In that sense, the DA comment stating that: "Dassault-Aviation consider that reference to the configuration "as certified by the Type Design" is sufficient ... There is no need to impose detailing the aircraft configuration down to the ATA (sub)system" is not acceptable. 2. In order to clearly underline the "subset" identity mentioned in point 1. above, the Agency changed the wording in the second bullet of CM chapter 3.3. paragraph Box1 that was stating: "The aircraft configuration to be addressed in accordance with the certificated type design" to a wording that states: "The aircraft configuration relevant to maintenance type training and which should be addressed in accordance with the certificated type design." Moreover, at the same bullet location, the text stating that: "The certificated a/c configuration detailed in Box1 should cover the complete base aircraft configuration and should leave the certificated configuration options..." was changed to state that: "The certificated a/c configuration detailed in Box1 should cover the complete base aircraft configuration relevant to maintenance type training and should leave the certificated configuration options...". 3. The Agency acknowledges and appreciates the DA understanding and support regarding the need to have the MCSD package content at the adequate level of detail. <p>The Proposed CM text was changed as highlighted above in point 2. The comment will be passed on to the group members of RMT.0106.</p>
9	Dassault Aviation			<p>Box 1 / MMEL</p> <p>EASA is requested to provide additional information regarding "MMEL specific maintenance actions" as Dassault-Aviation have never been provided with any EASA information regarding a possible link between the OSD MCS and the OSD MMEL.</p>				Accepted	<p>The link to the MMEL was mentioned here as an example of technical information that the TCH could consider specific to the type and, thus, include it in Box 1. In this context, the Agency considers this "e.g." as a logical link that does not need any additional specific notice "regarding a possible link between the OSD MCS and the OSD MMEL" as commented by DA.</p> <p>Nevertheless, in order to be very clear, we changed the CM wording from the one stating: "(e.g. location, description, indication, normal operation, abnormal operation, MMEL specific maintenance actions" to a new one that states: "(e.g. location, description, indication, normal operation, abnormal operation, MMEL specific maintenance actions called for, in some MMEL items dispatch condition, as maintenance procedure(s) (M))".</p> <p>The Proposed CM text was changed as highlighted above. The comment will be passed on to the group members of RMT.0106.</p>

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10	Dassault Aviation			<p>Box 2 / Trainee prerequisites</p> <p>Prerequisites shall be put in Box 1 or 3 (this will ensure a better consistency with the CS-FCD).</p> <p>As a reminder, DGT134476 (reference [2]) states: <i>"TCH minimum requirements for training are by default based on the assumption that the trainee has an entry level that meets Part 66 Appendix I or equivalent experience per Part 66, and the basic knowledge requirements of the license."</i></p>				Noted	<p>Regarding the FCD vs. MCSD comment of DA, we would like to re-iterate the Agency opinion that, whilst a general consistency between the various CSs related to OSD should be preserved, the specificities of each element of the OSD should prevail whenever this is required by the respective field.</p> <p>In this context, the inclusion in Box 2 or Box 4 of the trainee prerequisites identified by the TCH, whilst clearly stating the student population baseline of MCSD, gives sufficient flexibility to the end user (e.g. Part-147) of the MCSD in providing compensatory measures (if required) to enable the student population to meet the prerequisites stated by the TCH. The Boxes 2 and 4 have "status of AMC" (see GM No 3 to 21.A.15(d)) and an alternative means of compliance would be easier acceptable as opposed to the "status of rule" of Boxes 1 and 3. It is often that the Part-147 organisation provides an introductory "new technologies course" or "glass-cockpit a/c course" or "digital a/c course" prior to commencing a type rating training course on a modern a/c just to enable the students to meet a certain level of prerequisite knowledge of type rating training for that a/c.</p> <p>No change in the Proposed CM text.</p> <p>The comment will be passed on to the group members of RMT.0106.</p>
11	Dassault Aviation			<p>Box 2 / Options</p> <p>Dassault-Aviation consider that TASEm are made to be imposed to the end-user. So they can only be placed in Box 1 or in Box 3.</p> <p>In order not to impose to an operator a TASEm related to an option that would not be bought by this operator, Dassault-Aviation intention is to use a generic/protection sentence of the following type: <i>"Regarding options, data contained in this (OSD MCSD) document are only applicable, in the meaning of the OSD Box concept, if the option is installed in the operator's / trainee's aircraft."</i></p>				Accepted	The bullet with options is deleted.
12	Dassault Aviation			<p>Box 2 / Logical sequence</p> <p>As already stated in Chapter 2 "Background" comment above, TCH are not responsible for defining training course contents. The task of defining the training elements in a logical sequence should be assigned to the Training Providers, in order to take advantage of their instructional experience in delivering Type-training. So, the logical sequence cannot be part of Box 2.</p> <p>The Training Providers are very skilled in sequencing training in a step-by-step logical order so that each item taught builds upon another to ensure comprehension of the training objectives.</p> <p>Box 4 may be used in case a TCH decides to define a recommended training course content sequencing.</p>				Not accepted	<p>The Agency considers that the TCH should recommend a training sequence which in his view is the best way to achieve the necessary knowledge. Training organisations can deviate from these recommendations by using alternate means of compliance.</p> <p>The comment will be passed on to the group members of RMT.0106.</p>

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13	Dassault Aviation			<p>Box 2 / Training duration</p> <p>Training minimum duration is also to be placed in box 4 (as a reminder, CS-FCD allows both "2" and "4" boxes).</p> <p>Dassault-Aviation kindly remind their position regarding the training duration (please refer to DGT134476):</p> <p><i>"Dassault Aviation considers that the training duration does not need to be stated by the TC Holder</i></p> <p><i>From the minimum requirements established by the TCH, the Training Provider has to perform its Training Needs Analysis (TNA). The Training Provider then defines enabling objectives to determine the contents of its course based upon the training means that they have analyzed as best suitable. Only then an overall duration may be calculated (i.e. objectives drive training contents, and only then training contents drive duration).</i></p> <p><i>Where the Training Needs Analysis shows that more or less hours than the minimum specified in the table given in EASA Part 66 Appendix III 3.1.c. are needed, course lengths shall be longer or shorter (after competent Authority validation)."</i></p>				Accepted	Training duration has been moved to Box 4.
14	Dassault Aviation			<p>Box 2 / MTSD</p> <p>MTSD could be added in Chapter 1.3 "Abbreviations".</p>				Accepted	The Proposed CM text was changed by adding the MSTD in chapter 1.3 and correcting the order of wording in fourth bullet of Box2 chapter 3.3.
15	Dassault Aviation			<p>Box 2 / MTSD</p> <p>MTSD shall also be moved from Box 2 to Box 4.</p> <p>The TCH shall not be obliged to define the simulation devices that a Training Provider should use for training.</p> <p>It should be the Training Providers responsibility to select the specific type of MTSD that will be used for training. From their many years in the training industry the Training Providers have a better understanding of what is available, effective and required in the selection of MTSD to be used in training.</p> <p>This way of proceeding leaves the Training Provider free to define its best training means -as long as it complies TCH minimum requirements-, and also it leaves the doors opened in case of possible "future" training means some TCHs would not even be aware of.</p>				Accepted	MSTD has been moved to Box 4.

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16	Dassault Aviation	3.4		<p>Who this CM affects</p> <p>Dassault-Aviation suggest to make clear EU n°69/2014 OSD MCS applicability for a new TC, i.e that the OSD MCS is only applicable when the TC application date is greater than 17-Feb-2014. OSD MCS is not required for TC issued after the 17-Feb-2014 when the TC application date was before 17-Feb-2014.</p>				Noted	<p>The chapter 3.4 of the Proposed CM is addressing “who” categories and not “by when” categories.</p> <p>The Agency considers that this CM is neither the tool nor the place to discuss applicability dates which are clearly stated in (EU) No 69/2014. This comment from DA is conflicting in essence with the rationale presented by DA in comment Nr.7 of this table.</p> <p>EASA will discuss the applicability, on a case by case basis and in complete compliance with (EU) No 69/2014 provisions, with each individual TCH.</p> <p>Not related to this comment, but concerning this 3.4. chapter, the Proposed CM text was changed for consistency with chapter 1.1. the text stating: “the end result of the process described in this Certification Memorandum” was replaced with “the EASA Certification Policy elements presented in this Certification Memorandum”.</p>
17	Airbus	3.2	6	<p><u>TYPE RATING DETERMINATION</u></p> <p>Airbus has no specific comment on this subject for the interim period.</p>		Yes	No	Noted	<p>The Agency is acknowledging the “no specific comment” feedback from Airbus.</p> <p>No change in the Proposed CM text.</p>
18	Airbus	3.3	7	<p><u>MINIMUM SYLLABUS CONTENT</u></p> <p>Airbus understand the fact that enclosed proposal in the CM is clearly expressed as neither limiting nor exhaustive, however is concerned it might become the reference, while a dedicated rulemaking task on this topic is taking place.</p> <p>We thus would like to provide the following comments on the basis of work already conducted on this domain and for which there has already been many discussions between OEMs, Training organisations and EASA</p> <p>Trying to mirror the current flight crew process for the MCS by evaluating maintenance courses in which have been identified key elements for training (TASEm) is not what Airbus is contemplating, as a TC Holder does not necessarily have its own training organization. As a consequence the content of the various boxes might defers compared to the way it is expressed in the CS-FCD and which apparently has served as the basis for EASA proposal in its CM.</p>	Refer to later comments	No	Yes	Noted	<p>Whilst the Agency sees consistency of the various CSs related to OSD as a positive element in the layout of the regulation, there is a definite acknowledgement of the CS-MCSD specificity and its elements should not be expected to mirror the CS-FCD since they address a distinctly different field of aviation activity (please see also first paragraph of response Nr.10 in this Table).</p> <p>Whilst similarities between CS-FCD and CS-MCSD could be encountered, they are not perceived by the Agency as a priority objective of the CS-MCSD. Same applies for the envisaged process of implementation of the CS-MCSD compared to CS-FCD implementation.</p> <p>Figure 1 has been added to clarify the 4 boxes concept.</p> <p>Appendix I has been added to the CM in order to provide guidelines for MASE (former TASEm) identification. The text takes into consideration ongoing discussions within the RMT.0106.</p> <p>Appendix II has been added to the CM in order to provide an example of the format of the Minimum Syllabus.</p>

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19	Airbus	3.3	7	<p><u>Box 1 - Type rating determination for MCS</u></p> <p>The CM does not say anything about which process EASA will be using in the interim phase. The only OEB-Maintenance Training report available on EASA website (for the DA-42) refers to training aspects only and has no reference with respect to Part 66 .</p> <p>Airbus assumes thus that the process will be as of today, meaning a request to EASA for the addition of a type rating into the Part 66 appendix 1(when needed) based on the assessment of the combination of aircraft type and engine. Would EASA confirm?</p>		Yes	No	<p>Noted</p> <p>First part of the comment: The Proposed CM provides only a series of considerations that should be taken into account by the Applicant. Whilst, traditionally, the airframe – engine combination is the essential factor in deciding over a new or existing type, the OSD-MCSD assessment should not be deemed as being automatically resumed to this rationale. Other factors could play a role as well whenever they have significance for maintenance type training (e.g. digital avionics suite replacing a traditional one; fly-by-wire replacing traditional flight control system).</p> <p>Note: DA-42 does not belong to Group 1 in accordance with Appendix to AMCs to Part-66 and therefore no TR is requested for tis aircraft type.</p> <p>No change in the Proposed CM text.</p> <p>Not accepted</p> <p>Second part of the comment: As mentioned in response Nr.7 in this table, the obligations with respect to application for OSD-MCSD are clearly stated in (EU) No 69/2014. The Agency intends to use the Special Conditions as per 21.A.16A and 21.A.16B to enable compliance with 21.A.17B(a)2. until the time of CS-MCSD adoption and publication.</p>	
20	Airbus	3.3	7	<p><u>Box 1 - Aircraft configuration to be addressed by the Maintenance program.</u></p> <p>-While Airbus understand the need for a Part 147 Maintenance organization to monitor the training program attached to a dedicated aircraft configuration, Airbus would like to insist onto the fact that in the domain of OSD, the reference is the Type Certification Configuration, and the objective is not to develop training programs for Maintenance, but to ensure that the aircraft type design specifics are well covered when dealing with MCS.</p> <p>-The CM states: The certificated a/c configuration detailed in Box1 should cover the complete base aircraft configuration and leave any certificated configuration options (i.e. options at system, subsystem or equipment/appliance level in addition to/in place of the base configuration) to be addressed in Box2. Airbus does not support this classification for the BOX 2, as Airbus does consider that it is not an OEM duty to monitor all aircraft configurations for MCS, but an operator responsibility. As said, the aircraft configuration concerned is initially the one of Type Certification, then under the Change to OSD Part 21 principles, aircraft modifications have eventually also to be considered and analysed to identify OSD impact. There is currently a dedicated rulemaking task dealing with the Change to OSD and Airbus recommends seeing the outcome first, prior deciding what to do with modifications/options.</p>	Remove from Box1 the aircraft configuration data for the development of the MCS training programs.	No	Yes	Partially accepted	<p>The Agency considers that the aircraft configuration (based on the definition in CM chapter 1.4.) with relevance to maintenance type training should be clearly listed in Box1. This could be a subset of the type design defined configuration, it is considered as a distinct entity which is specific to OSD-MCSD and should be clearly listed here.</p> <p>The necessity to ensure that (as commented by Airbus) “the aircraft type design specifics are well covered when dealing with MCS” is exactly why the a/c configuration relevant to MCS type training is required to be mentioned in all the applicable details.</p> <p>This a/c configuration related to the initial TC should not be confused with subsequent changes to the TC for which, exactly as commented by Airbus, there is a dedicated rulemaking task and WG on-going. This is a distinct activity related to the second paragraph of Article 2 of (EU) No 69/2014.</p> <p>Please see also the responses Nr.8 and Nr.11 in this Table and the related changes in the text of this Proposed CM.</p>

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21	Airbus	3.3	7	<u>Box 1 - TASEm.</u> -No specific comment, except that the proposed wording imply “MAINTENANCE” in a broader sense, while the OSD is ONLY relevant in regards to Maintenance certifying staff. (Part 66 rule) not training content.		Yes	No	Noted	Whilst the Agency agrees that this Proposed CM is focused only on OSD elements of relevance to MCS type training, we should not lose sight of the end scope of the entire OSD-MCSD exercise which is to provide a safe and adequate a/c maintenance as perceived by the TCH.
22	Airbus	3.3	7	<u>Box 2 – Students pre-requisites.</u> -It appears to be consistent with the OSD-FCD, however as explained it is NOT a TC Holder duty to determine Training programs for MCS under the OSD concept, however this may be an option that the TC Holder may want to pursue. If so then the prerequisite and “generic” training should definitely a BOX 4, as it is upon request of the TC Holder that validation occurs as an optional element. What is MANDATORY for the TC Holder is to determine what the TASEm are (validated by EASA , so as to ensure they are then adequately incorporated into the development of MCS training programs, and this last part is the responsibility of Part 147 Maintenance Training organization, not the TCH, and the MCS Training program is to be approved by the NAA of the Part 147 Training organization.	Move Students pre-requisites to Box 4	No	Yes	Not accepted	The position of the Agency is that stated in response Nr.10 in this Table, namely that the inclusion in Box 2 or Box 4 of the trainee prerequisites identified by the TCH, whilst clearly stating the student population baseline of MCSD, gives sufficient flexibility to the end user (e.g. Part-147) of the MCSD in providing compensatory measures (if required) to enable the student population to meet the prerequisites stated by the TCH. The Boxes 2 and 4 have “status of AMC” (see GM No 3 to 21.A.15(d)) and an alternative means of compliance would be easier acceptable as opposed to the “status of rule” of Boxes 1 and 3. It is often that the P-147 provides an introductory “new technologies course” or “glass-cockpit a/c course” or “digital a/c course” prior to commencing a type rating training course on a modern a/c just to enable the students to meet a certain level of prerequisite knowledge of type rating training for that a/c. No change in the Proposed CM text.
23	Airbus	3.3	7	<u>Box 2– Optional Configuration item.</u> - See comments above Box 1 aircraft configuration.		No	Yes	Accepted	Optional systems has been moved to Box 3.
24	Airbus	3.3	7	<u>Box 2 – Logical sequence, training duration</u> -Refer to general comment, and comment for Box 2. This should be in the Box 3 and Box4: Optional for the TC holder. This is regulated by Part 147, not by the Part 21. Consequently Airbus recommends to keep the wording but to move it to Box 3 and Box 4, this should not appear neither in Box 1 nor in Box 2.	Move to Box 3 and Box 4	No	Yes	Not accepted	See above the response Nr.12 in this Table.
25	Airbus	3.3	7	<u>Box 2 – MSTD:</u> Airbus recognizes the value of promoting the right MSTD for the various tasks, however there are currently no specific guidance for this contrary to the FSTD for Flight, and there might be the need for further work in the future to allow adequate training credits for these MSTDs. May be could this be a task for the RMT MCS?		Yes	No	Noted	The Agency acknowledges and appreciates Airbus comment on the MSTD issue.
26	Airbus	3.3	8	<u>BOX 3:</u> Wording is generally fine, provided that analysis focuses on impact of differences with respect to TASEm, rather than aircraft configuration, see above comments.		Yes	No	Partially accepted	The intent of the Agency is to capture any differences that characterise the type or model vs. the base aircraft, be it that those differences generated by configuration differences with relevance to MCS type training have or not TASEm related elements.

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27	Airbus	3.3	8	BOX 4: -Wording is generally fine, provided that analysis focuses on impact of differences with respect to TASEm, rather than aircraft configuration, see above comments. -For optional configurations elements, refer to above comments.		Yes	No	Partially accepted	Box 4 content has been reviewed taking into accounts comments received and the ongoing discussion within the RMT.0106.