Which FAA 8130-3 release certificates are acceptable in Europe as per the Bilateral?	As per the Bilateral between USA and Europe, a document equivalent to the EASA Form 1 as per AMC 145.A.45(a) is described in the US-EU BASA as follows: - For new products, parts, appliances, refer to p.49 of the Appendix to Annex 1 of the agreement, which can be found here. Further details for the acceptance are contained in Technical Implementation Procedures (TIP), item 5.1.4 – page 5-3, item 5.1.6 - page 5-5, item 5.1.8 - page 5-7, item 5.1.10 - page 5-8, which can be found here. - For used products, parts, appliances, which are maintained by an FAA repair station holding an EASA part-145 approval in accordance with the BASA, refer to the Maintenance Annex Guidance (MAG) Section B - Certification Process for U.S.-Based Repair Stations, Appendix 1, chapter 10 (item (b). The FAA Form 8130-3 should include the EASA Part-145 release to service (typically called "dual release") in block 12, which further refers to: o the EASA Part-145 Approval Certificate number; and o specifies any overhauls, repairs, alterations, Airworthiness Directives, replacement parts, PMA parts and; o quote the reference and issue/revision of the approved data used. Just to summarize: • New components require the FAA Form 8130-3; • Used components require the FAA Form 8130-3 with "dual release".

Possibility to use Part 145 approvals to release to service non-EASA registered aircraft.	Aircraft registered outside the EU which are not covered by the Basic Regulation can only be released in accordance with the rules of the country where they are registered and only by organisations approved or accepted by that country. The Part-145 organisation can only release such aircraft using the EASA Part-145 approval if the third country recognises the Part-145 standard and the Part-145 approval held by the organisation. In any case, such release is issued fully under the responsibility of the third country. Please refer to the letter and procedures described in information letter and Annex table related to the maintenance release of aircraft not covered by the Basic Regulation http://easa.europa.eu/easa-and-you/aircraft-products/continuing-airworthiness-organisations/foreign-part-145-organisations
Discussion with regards to Operator's records vs AMO's records	‘‘Detailed maintenance records’ is the term mentioned in both Part-145 and Part-M. But the definition of ‘detailed maintenance records’ is slightly different in those Parts. In Part-M those records are required to be kept by the owner/operator to be able to determine the continuing airworthiness and configuration of the aircraft in accordance with part-M relevant for future maintenance. These are different from the detailed maintenance records required to be kept by a maintenance organisation as per M.A.614 or 145.A.55(c). Whereas maintenance organisations are required to retain all detailed records to demonstrate that they worked in compliance with their respective requirements, aircraft owners/operators need to retain those records required for assessing the aircraft configuration and the airworthiness of the aircraft and all components installed. ‘Dirty finger prints’ may not need to be transferred from the maintenance organisation to the aircraft owner/operator.

	The owner/operator should receive the aircraft release to service of the maintenance performed and all information necessary to determine the aircraft continuing airworthiness and its configuration, which includes: • References to tasks performed (summary sheet to the CRS), • Information and substantiating data on modifications, • Airworthiness directives, • Information and substantiating data on repaired and non-repaired damage, and measurements relating to defects. • records of installation of components on the particular aircraft, engine, or propeller, when affecting the configuration of the component/aircraft (may include EASA Form 1).
What is the advantage for an organisation to be AMO + CAMO approved if the privilege to perform Airworthiness Reviews (AR) is also granted to AMO for General Aviation? In addition, staff requirements are not coherent since there are no incompatibilities for staff being ARS with regards to maintenance activities.	The privilege for an AMO to perform AR is limited to the population of the ELA1 aircraft not used in commercial operations. However, it does not provide the possibility for AMOs to manage the CAW of the said aircraft and therefore they cannot extend the ARC when the aircraft is kept in controlled environment. The AMO, in accordance with M.A.902(l), can only preform an AR and issue the ARC together with annual inspection. Having both approvals allow the organisation to manage the continuing airworthiness of the aircraft, to maintain the aircraft, to issue the ARC for all aircraft (not only ELA1 aircraft not involved in commercial operations) and extend the ARC when the aircraft is in a controlled environment. The inconsistency mentioned related to the staff requirements, will be addressed in the Phase II of the Part-M GA Task Force.

Were oral exams considered as an option during the drafting of Opinion for the limitation of Part-147 privileges for basic examinations?	Oral examinations were not considered as an option because they carry a very significant subjectivity which does not help in Standardisation.
Why does EASA believe that the approval of the location (where the Part-147 exams will take place) provides less opportunities for fraud?	Although the possibility for fraud still exists, the scale of the problem is very significantly reduced. The reason is that currently these examinations can happen anywhere in the world as long as the Part-147 organisation has an approved procedure. With the proposal it can only happen at approved locations. This reduces the number of locations and the number of students who would be ready to travel to the approved locations.
In EASA's opinion, is the case of Part-147 fraud not due to not sufficient/inadequate NAA oversight?	This could be one of the problems. However, it cannot be reasonably expected that the NAA oversees every single training and examination anywhere in the world. The resources are not available.
GAMA would prefer that EASA enforces rule's compliance, rather than change the rule to limit organisation's privileges. Enforcement is a more difficult process in Europe than in the US and it might be that this fraud cases are only the tip of the iceberg.	It is very difficult, if not impossible, to ensure rule enforcement when the Part-147 organisations can currently perform examinations anywhere in the world based on an approved procedure.
EAMTC considers that the majority of the organisations work in accordance with the rules and that NAAs should identify the risk for proper oversight and EASA be careful about the impact of the measures to be taken.	The impact has been taken into account and that's why it has not been completely removed the privilege of Part-147 organisations to perform basic examinations. In addition, this will be an interim measure, since there will be in the near future a full review of Part-66 and Part-147, with the corresponding working groups, where other measures can be discussed.
The new B2L licences do not provide any advantage.	EASA does not agree with the statement. The B2L allows a person to start acting as certifying staff without covering the full B2 syllabus. After covering the elements of certain systems, the person can already obtain a B2L licence which allow certifying maintenance on those systems (particularly important for General Aviation where most of the maintenance could be limited to Radio and Communication systems). The B2L licence can be progressively upgraded to include new systems.

There are no sufficient Part-147 instructors. Could they be shared among different Part 147 organisations?	Yes, they can be shared. However, they have to be part of the staff and be qualified by each of the Part-147 organisations and they will be acting on behalf of each organisation.
Engines should be treated the same as aircraft with regards to their management (by a CAMO) and their import/transfer.	The Basic Regulation refers in the Article 4 'Basic principles and applicability' to the aircraft 'including any installed product, part and appliance'. The same principal is repeated in Article 1 of Commission regulation No (EU) 1321/2014. As a consequence, CAMOs are approved to manage the continuing airworthiness of the aircraft (including all components to be installed on that aircraft). CAMOs cannot be approved to separately manage the continuing airworthiness of engines.
Request that EASA is allowed to perform oversight for a conglomerate of companies seeking a single approval to operate in different Member States	EASA Opinion 01/2015 was published in March 2015. Chapter 2 contains the outcome of the consultation of the A-NPA with regards to the potential future amendment of the Regulation (EC) No 216/2008. In particular paragraph 2.4 of the Opinion, "Optimising the use of available resources", addresses the comments received with regards to this query and also contains EASA's proposed way forward: "to allow the possibility to voluntary and temporary (i.e. non-irreversible) transfer of responsibilities and tasks horizontally between competent authorities, but also vertically from competent authorities to EASA".
What are the conditions to accept 8130-9 in support of a major repair?	**TIP point 3.3.2.2 EASA Acceptance of FAA Repair Design Data.** For any repair performed on an aircraft or component **at the time of import to the EU**, an FAA form 8100-9 is acceptable in support of repair design data used for major repairs to non-critical components when: EASA has certificated/validated the product or appliance, FAA is the State of design of the repair data.

	Data for repairs to be performed by an EASA part-145 organisation on an EU registered aircraft or on components shall be approved in accordance with part-21.
Can a third country organisation benefit from the Bilateral agreement provisions?	No, it cannot. Article 12 of the EU-USA BASA limits the applicability of the agreement to EASA part-145 organisations with principal place of business in the territory where the Treaty establishing the EU applies.
With regards to the new Annex being discussed, who should assess the differences between TSO and ETSO standard prior to use an equipment TSO approved?	The design organisation drafting the design data for the installation of this equipment on the aircraft.
How is the Chinese system, more US-type (DER) or more EASA-type (DOA)?	The CAAC aviation regulatory framework is based upon the US FAR system.
What is the transition plan for the measures explained in Mr Kieft's in the MRB presentation?	The exact wording of the TIP amendment (including the transition arrangements) are still under discussion between the FAA and EASA. However, it is expected that the validating authority will continue to participate in any ongoing projects until either the MRBR initial approval is issued, or the next revision is approved.