

CRD - NPA 04/2004 - Draft Document 2

Comment	Response
Article 1	
Paragraph	
Cmt. 2 / Thomas Cook Airlines UK Ltd	
<p>The definition of 'authorised person' within the AMC includes 'aircraft owner'. This should be described as 'aircraft owner or operator'. (Please also note that there is no equivalent AMC in Part 145 that describes 'authorised person'.)</p>	Text changed.
Cmt. 4 / CAA UK	
<p>The paragraph suggested could present difficulties in cases where an engineer has submitted their licence to the Competent Authority for amendment, change of address, type rating addition etc. It is suggested that the wording in Part 66.A.55 should be the same as it was in JAR-66, "Certifying staff must be able to produce their licence... within a reasonable time", and the AMC for 66.A.55 should state that the licence should be produced within 24 hours.</p>	<p>A) The intention of this new paragraph is to harmonise Part-66 with paragraph 145.A.35(l). Moreover in order to ensure "legal certainty" paragraph 66.A.55 shall provide an adequate level of detail.</p> <p>Text not changed.</p> <p>B) Text changed</p>
<p>Alternatively, we would suggest that this paragraph could be amended to allow for a copy of the licence to be presented in cases where the original document has been submitted to the competent Authority or a similar note be placed in AMC 66.A.55.</p>	
Cmt. 5 / CAA UK	
<p>The proposed text would be grammatically more precise if the words "be able to" were deleted. This would have the effect of requiring the showing of the licence rather than requiring the ability to show a licence. This change, if adopted, would leave the following</p>	Text changed.
<p>"66.A.55 Evidence of qualification</p>	
<p>Personnel exercising certification privileges must produce their licence, as evidence of qualification, if requested by an authorised person, within 24 hours."</p>	
Cmt. 8 / DGAC France Mr. Telllet	
<p>Delete the proposed AMC 66.A.55.</p>	<p>The intention of this new paragraph is to harmonise Part-66 with paragraph 145.A.35(l). Moreover in order to ensure "legal certainty" paragraph 66.A.55 shall provide an adequate level of detail.</p> <p>Text not changed.</p>
<p>If necessary add a new "GM 66.A.55 Evidence of qualification "The competent authority to which personnel exercising certification privileges must be able to produce their licence may be the competent authority for the licence, the competent authority of the maintenance organisation in which the personnel is working or the competent authority for the continuing airworthiness of the aircraft on which the personnel is working"</p>	