

# CRD - NPA 04/2004 - Explanatory Note

Comment	Response
<b>General Comments</b>	
<b>Paragraph</b>	
<b>Cmt. 3 / CAA Norway</b>	
The Norwegian CAA has no comments to the proposed amendment.	Noted.
<b>Cmt. 6 / CAA UK</b>	
General Comment This requirement should be within Part M and Part 145. It already exists in Part 145 as requirement 145.A35(l), so it only remains for Part M to be revised.	In Part-M, the licence holder is responsible on his own and therefore Part-66 directly applies as in this environment there is no autorisation.  Text not changed.
<b>Cmt. 9 / Airbus</b>	
The last sentence of paragraph 3, about the comment period reduced to 6 weeks, is probably a mistake, since the comment deadline mentioned in paragraph 4 and on the rulemaking page of the EASA web site is 29 October 2004 (and 31 October 2004 on the comment form!), which corresponds to the standard 3-month comment period. In this case, the full comment period of 3 months is appropriate since, contrary to what is stated in paragraphs IV and V of the explanatory note, the proposed paragraph 66.A.55 is different from the existing JAR 66.55 and may have a regulatory impact - see our comment on this paragraph.	Noted.  As NPA 4/2004 was published on the Agency website on the 29 July 2004 and the closing date was the 29 October 2004, a the three month consultation period has been respected. However due to an editorial error, the NPA document stated a 6 weeks consultation period.
<b>Cmt. 11 / CAA Sweden</b>	
EASA-NPA 4/2004 Draft Opinion of the European Aviation Safety Agency amending Commission Regulation (EC) No 2042/2003 and Draft Decision of the Executive Director of the Agency amending Decision 2003/19/RM on acceptable means of compliance to the Commission Regulation (EC) No 2042/2003  With reference to the above proposal we wish to express our support for the proposed amendments.	Noted.