

CRD - NPA 09/2004

Comment

Response

Annex II Part-145

Paragraph -

Cmt. *MTU Aero Engines*

MTU Aero Engines (Approved Maintenance Organization DE.145.0019) supports all proposals concerning Annex II of Regulation 2042/2003 and AMC / GM Part 145.

Further Comment:

Please check the reference to 145.A.25 (a) (2) in AMC 145.A.30(d)5. We believe that this is an error.

1. Comment noted.

2. The Agency believes that reference to 145.A.25(a)(2) is correct. Text not changed

Comment**Response**

AMC/GM Part-66

Paragraph -

Cmt. *Danche, Joseph*

We propose to you to put the b300 and the b350 on the same line

The list included in Appendix I to AMC 66 considers mainly the "maintenace training needed"

Text changed

Cmt. *Lyon Maintenance*

Appendix 1 - Aircraft type rating for Part66- AML

" Fokker F70 (RR Tay)
Fokker F100 (RR Tay) "

2. PROPOSED TEXT/ COMMENT:

Fokker 28 Mk 0070 / 0100

Reason:

a/ The type of aircraft would be consistent with the Data Sheet

b/ If the F28 Mk 0070 and the F 28 Mk 0100 are two different types (for maintenance) then one would need two different trainings and two different Part147 examinations. Since the Maintenance Documents (AMM, IPC, SRM, WDM) for the F28 Mk 0070 and the F 28 Mk 0100 are joint, then both aircraft should be considered as a single type.

Text changed but not as proposed

This is adressed by the NPA (Appendix I to AMC 66)

Comment**Response****AMC/GM Part-147****Paragraph**

-

Cmt. *Airbus*

AMC 147.A.105(b), and paragraph 4 of GM 147.B.115

The proposal to suppress "and (g)" in AMC 147.A105 tends to confirm that it is no longer necessary to use a Form 4 for the acceptance of Examiner and Practical assessor. However paragraph 4 in GM 147.B.115 states: " A change of any of the senior personnel specified in 147.A.105(b) or the examination staff in 147.A.105(g) requires the maintenance training organization to submit a Form 4.."

This means that, by referring to Part 147 Section B guidance material, the Competent Authority may request the training organization to submit Forms 4 for the examination staff, while it is acceptable under Section A AMC to renounce Forms 4 for this group of persons.

PROPOSAL:

In GM to 147.B.115 (4), delete 'or the examination staff in 147.A.105 (g)'

1. For examination staff submitting of EASA Form 4 remains in force

The Agency agrees that there is an inconsistency but proposes to impose a Form 4 for examiners rather than what is proposed by the commentor. Therefore in AMC 147.A.105(b) and (g) the reference to "and examination staff as specified by 147.A.105(g)" is added after the reference to 147.A.105(b)

GM147.B.115 (4) remains as proposed in NPA

Comment**Response**

Draft Commission Regulation

Paragraph -

Cmt. *SENASA*

Article 7, paragraph 3.(c) of regulation 2042/2003

- 145.A.30 (g) as applicable to large aircraft with a maximum take-off mass of more than 5700 kg.

The word 'large' should be deleted.

The word "large" will be deleted in Article 7, paragraph 3(c) to Commission Regulation (EC) No 2042/2003

Text changed.

Comment**Response**

Draft Agency Decision

Paragraph -

Cmt. *SENASA*

AMC M.A. 706 (a) Personnel Requirements
With regard to the accountable manager, it is normally intended to mean the chief executive officer of the maintenance continuing airworthiness management organisation approved under M.A. Subpart G

the words "continuing airworthiness management organisation" will be added to AMC M.A. 706 (a) Personnel Requirements.

Text changed but not as proposed.

Comment	Response
GENERAL COMMENT(S)	
Paragraph -	
Cmt. <i>SENASA</i>	
'Appendix VII to AMC M.B.702 (f) EASA Form 13', Part 3 of Form 13, point 5.2. '..AMC M.A.201 (h) 1. ' instead ' AMC M.A.201 (h) 2.'	Text changed.
Cmt. <i>SENASA</i>	
Appendix VII to AMC M.B.702 (f) EASA Form 13', Part 3 of Form 13, Part 5: Appendices. 5.2 List of airworthiness review staff. 5.3 List of sib-contractors as per AMC M.A.201 (h) 1 : 5.6 Copy of contracts with approved maintenance organisations.	Text changed.
Cmt. <i>Chelton Radomes Ltd</i>	
Changes are accepted as satisfactory	Comment noted
Cmt. <i>CAA-UK</i>	
Part M Appendix II EASA Form 1 Block 19 Release statement should reflect Part M Sub Part F release and not Part 145 release.	Explanation on how to fill block 19 of Form 1 will be changed to avoid any confusion.
Cmt. <i>CAA-UK</i>	
Part M Appendix II EASA Form 1 Block 13 should include a statement to reflect the component is not suitable for fitment to Commercial Air Transport Aircraft.	Explanation on how to fill block 19 and therefore indirectly block 13 of Form 1 will be changed to avoid any confusion.
Cmt. <i>CAA-UK</i>	
Para AMC 145.B.35(1) Reinstate the word 'approval' deleted from the first line to make sense.	The first sentence of AMC 145.B.35(1) will be deleted as it does not give any added value to the AMC Text changed but not as proposed
Cmt. <i>CAA-UK</i>	
Para 145.A.60 or AMC 145.A.60(b) There should be a cross reference to AMC 20-8 to clarify what is considered to be a reportable occurrence.	Reference added to AMC 145.A.60(b) Text changed
Cmt. <i>CAA-UK</i>	
Para 147.B.10 Should include a similar requirement to 145.B10 (3). To ensure competent authority have the necessary knowledge, experience etc and be trained to Part 147 etc.	The text from 145.B.10(3) will transferred and adapted to 147.B.10 Text changed

Comment	Response
<p>Cmt. CAA-UK</p> <p>Part 66 Section B</p> <p>There is currently no requirement for competent authority staff involved in the issuing of Part 66 licenses to have the necessary knowledge, etc and be trained to Part 66 etc.</p>	<p>The intent of NPA 9/2004 is not to introduce new requirements but to correct editorial errors and misunderstandings in Regulation 2042/2003.</p> <p>Changes of substance in section B may be considered in future Rulemaking programmes if "standardization inspections" show the need for it.</p> <p>Text not changed</p>
<p>Cmt. CAA-UK</p> <p>Annex III Part 66 Appendix 1, Module 12</p> <p>Add 'Tail Rotor Drive Shafts, Flexible Couplings, Bearings, Vibration Dampers and Bearing Hangers' to Module 12.4</p> <p>Additional text to cover important missing item.</p>	<p>Text changed</p>
<p>Cmt. CAA-UK</p> <p>Part-66 Appendix II Para. 1.7</p> <p>Amendment to Part-66 Appendix II Para. 1.7. Delete 'and'.</p>	<p>Text changed</p>
<p>Cmt. CAA-UK</p> <p>Annex III Part-66 App V</p> <p>The number VIII is used in two separate fields on the licence, Authority and Conditions.</p>	<p>This is in line with ICAO Annex I licence format, which use number VIII for authority and conditions.</p> <p>For sake of clarity it is proposed to use VIII(a) for authority and VIII(b) for conditions</p> <p>Text changed.</p>
<p>Cmt. CAA-UK</p> <p>Annex III Part-66 App V</p> <p>Licence not correctly in ICAO Annex I format</p>	<p>Appart to the reference to the "colour" the corrected licence seems to be in line with ICAO Annex I format.</p> <p>Text not changed.</p>
<p>Cmt. CAA-UK</p> <p>General</p> <p>The changes proposed do not address the current inconsistencies in dealing with findings between Parts both in sections A&B.</p> <p>See 147.30; 21:B143, 145:B.50; M.B.605 & MA.619, 145B.95, 147.A.160</p>	<p>This issue was addressed in the JAA COrA report, which has been incorporated into the EASA workprogramme. One should take into account nonetheless that total harmonisation may be difficult to obtain as each approval may not have the same direct effect on flight safety and therefore each case must be reviewed before final position is taken. This is why this work has not been considered as an editorial or a minor change.</p>
<p>Cmt. CAA-NL</p> <p>AMC M.A.706 (a) Personnel requirements</p> <p>With regard to the accountable manager, it is normally intended to mean the chief executive officer of the maintenance continuing airworthiness management organisation approved under M.A. Subpart G, who by virtue of position has overall (including in particular financial) responsibility for running the organisation.</p>	<p>Text changed.</p>
<p>Cmt. CAA-NL</p> <p>Annex II, Part 145.A.15 Application</p> <p>Better to change in the text from Part 66.A.10 and Part 147.A.15 the word 'amendment' into 'variation' to bring these Parts in line with Part M and Part 145.</p>	<p>The subject has been reviewed throughout Regulations 2042/2003 and 1702/2003 and the word "changes" is the one that is used for POA and DOA. Since the intention is the same, the word "changes" will be used throughout Regulation 2042/2003.</p>

Comment	Response
<p>Cmt. CAA-NL</p> <p>Annex II, AMC 145.A.75(b); Annex III, GM 145.A.70 para9; Annex IV, AMC 66.A.10 para 2 and 3 / A.45(a) para 1 / B.100 para 1 / B.105 para 2 and 3.</p> <p>The CAA-NL does not see the justification for these particular changes since there are a lot of other places in the text of the AMC and GM where the word 'Part' is missing in front of a paragraph reference and there is no proposal to include this word.</p>	<p>The way the cross-references are written is important to the understanding of the AMC material. It is therefore essential that the codification of the paragraphs be homogenous.</p> <p>The text has been reviewed and wherever the word Part should be used to refer to the Regulation it has been added for clarity.</p>
<p>Cmt. CAA-NL</p> <p>Annex II, AMC 145.B.35(1) Changes.</p> <p>Disagree, better to use the following text:</p> <p>The following changes to the 145 approval should not be subject to the indirect approval procedure:</p> <ul style="list-style-type: none"> - Name change - Change of accountable manager - Address change - Approval scope and rating - New facility - Any other change to the approval designated by the competent authority. <p>The applicable part/s of the EASA Form 6 should be used for the change.</p>	<p>The references to indirect approval changes have not been included into Part-145 except for those detailed in 145.A.70. This is not the case for Part-M. The work on COra will enable EASA to make the changes requested by harmonising the EASA rules.</p>
<p>Cmt. CAA-NL</p> <p>Annex III, Part 66.A.40 Disagree with the proposal, leave text as is.</p>	<p>There is no possibility offered to extend the validity of the licence on the document. It is therefore not possible to extend the 5 years period, each time the licence is amended. This option is not offered in the ICAO Annex either. Nonetheless the problem described is not of a major consequence as most authorities reissued the licence whenever a new type rating is added/endorsed. The comment cannot be taken into account.</p>
<p>Cmt. CAA-NL</p> <p>V. Regulatory Impact Assessment 9. The proposed changes being editorial, they will have no impact.</p> <p>9. The proposed changes being editorial, they will have limited impact on industry.</p> <p>The changes in computerized approval control systems and approval schedules as a consequence of the new C ratings for approved maintenance organizations are to be made by the authorities. A implementation period is necessary.</p> <p>Reason:</p> <p>The inclusion of 2 new C-ratings triggers the amendment of the CAA-NL computerized approval control system and may trigger the amendment of a limited number of approval schedules.</p>	<p>These changes reflect the new ATA chapters that airlines and maintenance organisations are using daily. This modification, if it does have an impact, will be beneficial to the industry by harmonising their scope of work and the way they classify components.</p> <p>The modifications proposed are minor, furthermore they only address the approval certificates which are of a very limited number and finally the two new ratings concern "water ballast" and "propulsion augmentation" are not very common in air transportation and the implementation of Part M starts in 2008 which gives 3 years of transition.</p> <p>EASA does not think it is necessary to change the text.</p>

Comment	Response
<p>Cmt. <i>CAA-NL</i></p> <p>Various</p> <p>At various places proposals are made to improve the wording used on the unlimited duration of approvals/ certificates. The individual proposals are as such correct, but we would have liked to see first the result of the evaluation the agency shall make on the duration of the validity of approvals as required in EC 1702/2003 article 5.5 and EC 2042/2003 article 7.6 as agreed in the EASA rulemaking comité during 2003 while discussing these regulations.</p>	<p>Comment noted</p> <p>The results of the on-going evaluation undertaken by the Agency could be used to launch a new Rulemaking task if justified.</p>
<p>Cmt. <i>CAA-NL</i></p> <p>arious approval forms CONDITIONS: 1. This approval is limited to that specified in the scope of approval <work> <DELETED approval> section of the approved .. Organisation manual ..., and</p> <p>On Approval schedule form This approval schedule is limited to those products and activities specified in the scope of <work> (DELETED approval) section contained in Part approved organisation manual</p>	<p>1. Text changed but not as requested (see comparable comment from CAA-Norway). 2. The POA format shall be followed. Text changed.</p>
<p>Cmt. <i>CAA-NL</i></p> <p>AMC M.A. 306 (a)</p> <p>AMC M.A. 306 (a) is a copy of (JAR) AMC OPS 1.915. 'During copying' the text of the abbreviated Certificate of Release to Service is deleted. Please insert concerning JAR text between paragraph V and VI of AMC M.A. 306 (a)</p>	<p>The text has been omitted during the transition from JAR-OPS to Part-M. The abbreviated CRS will be reintroduced.</p>
<p>Cmt. <i>Airbus</i></p> <p>Parts M, 145, 66, 147</p> <p>- Airbus strongly supports the introduction of tables of contents into the Annexes to EC No.2042/2003. - We further welcome the clarifications and corrections introduced into these documents of international importance.</p>	<p>Comment noted.</p>
<p>Cmt. <i>Air France</i></p> <p>M.A.305 Aircraft continuing airworthiness record system (h) An owner or operator shall ensure that a system has been established to keep the following records for the periods specified: 1. all detailed maintenance records in respect of the aircraft and any life-limited component fitted thereto, at least 24 months after the aircraft or component was <permanently withdrawn from> <DELETED> released to service, and;</p>	<p>EASA agrees that imposing such record keeping would be too burdensome and goes well beyond what is the common practice today imposed by JAR OPS. EASA intends to use the following wording that takes into account the concern of this comment, the comment made by MOT Austria, ICAO Annex 6 SARPs and the text of the Opinion 3/2004 .</p> <p>"M.A.305 Aircraft continuing airworthiness record system</p> <p>(h) An owner or operator shall ensure that a system has been established to keep the following records for the periods specified: 1. all detailed maintenance records in respect of the aircraft and any service life-limited, component fitted thereto, until such time as the information contained therein is superseded by new information equivalent in scope and detail but not less than 24 months after the aircraft or component has been released to service, and;"</p>

Comment	Response
<p>Cmt. <i>CAA, Norway</i></p> <p>Annex I Part M m) Appendix III Airworthiness Review certificate - Form 15b. -//- - Form 15a. -//- o) Appendix V Approval Certificate Part-M Section A Subpart F Maintenance Organisations -//- p) Appendix VI Approval Certificate Part-M Section A Subpart G Continuing Airworthiness Management Organisation</p> <p>Annex II Part-145 g) Appendix III Approval Certificate Part-145 Maintenance Organisation</p> <p>Reference is made to the proposals to replace expression 'A member of the European Aviation Safety Agency' by 'Member State of the European Union'.</p>	<p>There is no need to modify the proposed text of NPA 9/2004 replace the expression "A member of the European Aviation Safety Agency" by "Member State of the European Union"</p> <p>Moreover, the comment of CAA-Norway cannot be taken into account as Norway is not a Member of the European Union and the extension to the EFTA states will be given by amendment of the EEA agreement.</p> <p>Text not changed</p>
<p>Cmt. <i>ACG Austria</i></p> <p>Supports NPA.</p>	<p>Comment noted.</p>
<p>Cmt. <i>EASA Cert</i></p> <p>1. Part- 145 Appendix IV (1) Elast line should be "a member of certifying staff"</p> <p>2. 145.A.95 (a) "hazards seriously" should be "seriously hazards" (do a search for all similar examples in Part 145 and Part M including AMC)</p> <p>3. Part-145 Appendix II table borders for paragraph 12 and table borders for Table 1</p> <p>4. Part-145 Appendix III: a) header of Form 3 to include: Member State/Agency b) Company name to have second line for address [CO Name] [Address]</p> <p>c) page 1 and subsequent pages to have box & footer with EASA Form 3</p> <p>Clean up: reference/date of issue/signature spacing</p> <p>check consistency of approval certificates subpart f Part 145</p>	<p>Text changed accordingly.</p>
<p>Paragraph -</p>	
<p>Cmt. <i>LBA</i></p> <p>In Article 2 the definition for 'large aircraft' is given: 'large aircraft' means an aircraft, classified as an aeroplane with a maximum take-off mass of more than 5 700 kg, or a multi-engined helicopter; In Annex IV to Decision No 2003/19/RM the Appendix I 'Aircraft type ratings for Part-66 aircraft maintenance licence' paragraph 3. and 4.: The helicopters are separated in 'helicopter with a maximum take-off mass of 3175 kg and above' and 'helicopter with a maximum take-off less than 3175 kg'. The definition 'large aircraft' is used in the paragraphs 66.A.30 (a) 3. & 4. and 66.A.45 (g) & (h) for the definition of 'required experiences' or 'group ratings'. A explanation is need, if group ratings should be issued by drawing the line between single-engined and multi-engined helicopters or between 'helicopter with a maximum take-off mass of 3175 kg and above' and 'helicopter with a maximum take-off less than 3175 kg' or should be the line between 'helicopter with a maximum take-off mass of 5700 kg and above' and 'helicopter with a maximum take-off less than 5700 kg'?</p>	<p>The comment indicates that a mistake has been made in Appendix I to AMC 66. This list came from a JAA TGL and the definition of large aircraft was omitted. Appendix I paragraph 3 and 4 will be corrected to be:</p> <p>3 multi-engined helicopter and/or helicopters requiring type training and individual type rating</p> <p>4 single-engined helicopters eligible to type examinations and groups ratings</p>

Comment	Response
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: Part-145 Appendix II Delete '/' symbol after 'aeroplanes' in Table 1 for A1 and A2	Text changed
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: Part-145 Appendix III Change 'All types' in right column of table for D1 Non destructive Testing to a specific type of NDT. Reason: NDT rating must be specific	The example completion in form 3 has been amended to avoid confusion: "all types" will be replaced by the example "radiographic"
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: Part-145 Appendix III Change 'scope of approval' to 'scope of work' in Condition 1 on certificate.	Text changed
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: Part-145 Appendix III Change 'scope of approval' to 'scope of work' in Condition 1 on certificate.	Text changed to "in the scope of work section contained in the Part 145...."
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: 145.A.30 Add tab to the text after 145.A.30 (j)(5)(ii) starting with 'All such cases..'	Text changed
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: 145.A.35 Clarify the definition of 'Category B1 and B2 support staff' in the second part of subparagraph (a)	In the base maintenance environment the B1 and B2 support staff do not necessarily hold certification privileges. Text deemed to be clear.
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: 145.A.35 Clarify the text '..listed in Part-66..' in the first part of subparagraph (b)	"listed in Part 66" replaced by "as required by Part 66" Text changed but not as proposed

Comment	Response
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.A.35</p> <p>Include 'and category B1 and B2 support staff ' to last sentence of subparagraph (j), dealing with access to personal records.</p> <p>Add tab to all text under this subparagraph (j)</p>	<p>'and category B1 and B2 support staff ' is added to the last sentence of paragraph (j)</p> <p>Text changed.</p>
<p>Paragraph -</p>	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.A.45</p> <p>Add tabs to second parts of texts under subparagraphs (a) and e)</p>	<p>Text changed</p>
<p>Paragraph -</p>	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.A.45(b)</p> <p>Revise text of 145.A.45 (b)(2). It seems to indicate that member state authorities will issue AD's.</p> <p>Reason: authorities no longer issue AD's, EASA does that for the EU Member Sates</p>	<p>The term authority in 145.A.45(B) (2) is not limited to EU Member States but may include any other authority like FAA, TCCA etc.</p> <p>Text not changed</p>
<p>Paragraph -</p>	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.A.55(b) and AMC 145.A.55(b)</p> <p>Clarify what is meant with 'each certificate of release to service'</p> <p>Reason: in Part-M owners or operators are only required to have certificates for engines, propellers and components which have life limits (M.A.305).</p>	<p>The operator's responsibilities for retention of the CRS are dealt within Part-M.</p> <p>Text not changed</p>
<p>Paragraph -</p>	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.B.20</p> <p>Delete 'and recommendations' under subparagraph 6 or clarify which recommendations are meant (surveyor recommendations for approval of organisation?)</p>	<p>Recommendations are not considered to be level 3 findings from the former JAA system, they consist advice from the competent authority to the organisation and therefore must be recorded.</p> <p>Text not changed</p>
<p>Paragraph -</p>	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.B.55</p> <p>Revise (a) and (d) under subparagraph 2.</p>	<p>Application and continuation are two distinct subjects and should not be merged</p> <p>Text not changed</p>

Comment	Response
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Change title to AMC.145.A.(j)(5).	Specified reference not found
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.15 Refer to AMC Appendix III for EASA Form 2. Reason: appendix III to AMC is not referenced anywhere now.	AMC 145.A.15 amended to include reference to Appendix III to the AMC
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.30(e) In third part of paragraph 7 text 'paragraph 5' should be 'paragraph 6'	Text changed
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.30(j)(4) Under paragraph 2(ii)(d) remove 'internal and'	Text changed as "internal" is already covered in the previous paragraph.
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.35(j) Change 'approval' to 'authorisation' in paragraph 1(g).	Text changed.
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.45(f) Change title to AMC 145.A.45(e).	Text changed
Paragraph -	
Cmt. <i>Jargon Aviation Consultancy</i>	
Affected paragraph: AMC 145.A.45(g) Add new AMC 145.A.45(f) covering subparagraphs 2 and 3 of AMC 145.A.45(g) and delete these from AMC 145.A.45(g)	Text changed

Comment	Response
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.A.50(a) Change title to AMC 145.A.50(d) and remove subparagraph 1.3 Make new AMC 145.A.50(a) which only covers subparagraph 1.3 of present AMC.	The subparagraph 1.3 of AMC 145.A.50(a) will remain under this AMC. All other paragraphs of this AMC 145.A.50(a) will be transferred to AMC 145.A.50(d) to be merged with existing text. Text changed
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.A.50(a) Change numbering 1.2 to 1.1 and 1.3 to 1.2 (if still present (see other comment)	This proposal is not anymore applicable due to the amendments to AMC.A.50(a) (see JAC comment related to the same paragraph)
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.A.50(b) Add sentence to include AMO reference number on certificate	Sentence added to AMC 145.A.50(b)(1), below CRS statment to state: "Reference should also be made to the EASA Part 145 approval number"
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.A.65 (c)(1) Change last sentence of subparagraph 11 to explain only what is meant with 'smallest organisation'	Definition of "smallest organisation" is already dealt with in GM 145.A.10 Text not changed
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: 145.A.75(b) Change the word 'know' in subparagraph 4.5 to 'inform'	"know" is replaced by "record" Text changed but not as proposed
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.B.20(5) Change title to AMC 145.B.20(6). Combine wit existing AMC 145.B.20(6) ?	Text remains in AMC 145.B.20(5) as the Form 6 is the vehicle to communicate with the organisation Text not changed
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i> Affected paragraph: AMC 145.B.25(1) Consider issuing paragraph 1 as AMC 145.B.15	There is no added value to change text. Text not changed.

Comment	Response
Paragraph -	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: 145.B.50(a) and AMC 145.B.50(b)</p> <p>Revise texts to eliminate duplication</p> <p>Reason: third paragraph of AMC 145.B.50(a) on re-certification is identical to AMC 145.B.50(b) subparagraph 2.</p>	Duplicate text deleted in AMC 145.B.50(a)
Paragraph -	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: AMC appendices</p> <p>Reformat forms to ensure correct lay out</p>	Formatting changed
Paragraph -	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: AMC Appendix II</p> <p>Correct typo in Part 3 of Form 6 under 4.2 "Ooperator"</p>	Text changed
Paragraph -	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: AMC Appendix III</p> <p>Delete '/airships' in scope of approval (4 times)</p> <p>Reason: airships are covered under A4</p>	Text changed
Paragraph -	
<p>Cmt. <i>Jargon Aviation Consultancy</i></p> <p>Affected paragraph: AMC 145.A.70(a)</p> <p>Change text for MOE section 1.6 to 'List of certifying staff and B1 and B2 support staff' (also in EASA Form 6 in AMC Appendix II)</p> <p>Mind layout of main numbering (not on right hand side)</p> <p>Change second 'Part 2' to 'Part L2'</p>	<ol style="list-style-type: none"> 1. Text changed in section 1.6 as requested 2. Text changed to L2

Comment

Response

Paragraph

-

Comment

Response

Cmt. ENAC

[SEE PAPER COPY FOR CHANGES]

In addition to what already included in the proposed NPA, it is proposed the following changes:

At page 1 of 2 of EASA Form 3 - Part M

Page 1 of

[AUTHORITY NAME]
competent authority of [MEMBER STATE]
A member state of the European Union

Pursuant to Commission Regulation (EC) No 2042/2003 for the time being in force and subject to the condition specified below the Member State [competent authority] hereby certifies

[COMPANY NAME] OF MAINTENANCE ORGANISATION] or [COMPANY NAME] MAINTENANCE ORGANISATION

as maintenance organisation as referred to in Part-M Section A Subpart F approved to maintain the aircraft, components products and perform specialised services listed in the attached approval schedule and issue related certificates of release to service using the above reference

CONDITIONS:

Date of original issue: Signed:

Date of this revision :

Revision No:.....

Date of attached schedule of approval: For the competent Authority

EASA Form 3-Part M - Page 1 of

At page 2 of 2 of EASA Form 3 - Part M

Page 2 of

Maintenance Organisation Manual Reference

1. Text changed

2. Text changed but not as requested to read "products, parts and appliances" as done for the POA.

The expression "and perform specialised services" is not taking into account as they are carried out on products, parts and appliances as such way they are released to service.

3. The POA format shall be followed. Text changed.

Comment	Response
<p>Date of original issue:</p> <p>Date of this revision :</p> <p>Revision No:.....</p> <p>Signed:.....</p> <p>.....</p> <hr/> <p>EASA Form 3-Part M - Page 2 of</p>	

Paragraph -

Cmt. *ENAC*

1. To add rows relevant to paragraphs M.A.618 Continued validity of approval and M.A.619 Findings

2. To change wording under the subject column to align them to part M paragraphs heading

1. Text changed to add paragraph M.A 618 but M.A 619 is addressed through part 4 of Form 6F and therefore a row for M.A 619 is not necessary.

2. This is a formating issue. Comment accepted.

Paragraph -

Cmt. *ENAC*

1. To add rows relevant to paragraphs M.A.202 Occurrence reporting, M.A.301 Continuing airworthiness tasks, M.A.307 Transfer of aircraft continuing airworthiness records, M.A.715 Continued validity of approval and M.A.716 Findings

2. To change wording under the subject column to align them to part M paragraphs heading

1. Text changed to add paragraphs M.A. 202, M.A. 307 and M.A. 715 but M.A. 301 is already addressed through paragraph M.A. 708 and M.A. 716 is address trough Part 4 of the form and therefore a row for M.A. 716 is not necessary.

2. This is a formating issue. Comment accepted.

Paragraph -

Cmt. *ENAC*

To change heading of the appendix
Appendix X to AMC M.B.702(a) EASA Form 4

The reference to the AMC is not included as this form is used in several places in the AMC to Regulation (EC) 2042/2003.

The proposal of NPA 9/2004 is therefore not changed.

Paragraph -

Cmt. *DAC Luxembourg*

Delete the proposed example of licence format for AML as it will not provide any improvement. There is no additional information on the document and the available space for Part-66 Aircraft Type Ratings is partially lost. Experience has shown that this space is yet quite small, as some mechanics have a lot of type ratings.

Points X and XI of EASA Form 26 will be transferred below point IX and Point XII remains unchanged.

As we have preprinted the licence format on security paper we would have to order new models what would cause us additional costs, work and delays.

There is space for type rating endorsment available as before.

If the change to the new licence format should be done, will the licences issued yet stay valid or would we have to contact the mechanics to send us back their old Part-66 AML?

The vast majority of Member States have chosen to opt-out from Part 66, therefore Europe wide this would not be overly burdensome, nonetheless in the case of Luxembourg the possibilities in Article 10 of Regulation 1592/2002 could be used.

Comment	Response
Paragraph - <input type="text"/>	
Cmt. <i>Jargon Aviation Consultancy</i>	
<p>Affected paragraph: GM 145.A.10</p> <p>Under paragraph 6.1 last sentence, reconsider word 'postholder'</p> <p>Reason: postholder not used in Part-145 only in JAR-OPS, might cause confusion.</p>	<p>There is no added value to change the text.</p> <p>Text not changed</p>
Paragraph - <input type="text"/>	
Cmt. <i>ENAC</i>	
<p>Second statement under point (b) should be identified as point (c):</p> <p>M.A.704 - Continuing airworthiness management exposition</p> <p>..</p> <p>(b) The continuing airworthiness management exposition and its amendments shall be approved by the competent authority.</p> <p>(c) Notwithstanding paragraph (b) minor amendments to the exposition may be approved through an exposition procedure (hereinafter called indirect approval)</p>	<p>Text will be changed.</p>
Paragraph - <input type="text"/>	
Cmt. <i>ENAC</i>	
<p>Affected paragraph: M.A.708(c)</p> <p>to add the words 'of the same type of aircraft' after 'or an other operator'</p> <p>M.A.708 - Continuing airworthiness management</p> <p>..</p> <p>(c) In the case of commercial air transport, when the operator is not appropriately approved to Part-145, the operator shall establish a written maintenance contract between the operator and a Part-145 approved organisation or another operator of the same type of aircraft, detailing the functions specified under M.A.301-2, M.A.301-3, M.A.301-5 and M.A.301-6, ensuring that all maintenance is ultimately carried out by a Part-145 approved maintenance organisation and defining the support of the quality functions of M.A.712(b). The aircraft base, scheduled line maintenance and engine maintenance contracts, together with all amendments, shall be approved by the competent authority.</p>	<p>The intent of this paragraph has never been to have operators contracting maintenance with another operator that was not itself operating aircraft of the same type. This was clearly stated in JAR-OPS Subpart M. During the transfer to the EU environment this provision seems to have been omitted. The way the paragraph was written seems to have led stakeholders to believe this rule had changed. To correct this, the proposed change will be taken into account .</p>

Comment	Response
Paragraph - <input type="text"/>	
Cmt. ENAC	
<p>to replace the word 'unscheduled' with 'occasional'</p> <p>M.A.708 Continuing airworthiness management 1. an aircraft requiring unscheduled occasional line maintenance, the contract may be in the form of individual work orders addressed to the Part-145 maintenance organisation.</p> <p>AMC M.A.708 (c) (1) Continuing airworthiness management unscheduled occasional maintenance</p> <p>The intent of this paragraph is that maintenance contracts are not necessary when the operator's continuing airworthiness system, as approved by the competent authority of operator, specifies that the relevant maintenance activity may be ordered through one time work orders. This includes for obvious reasons unscheduled occasional line maintenance and may also include aeroplane component maintenance up to engines, so long as the competent authority of operator considers that the maintenance is manageable through work orders, both in term of volume and complexity. It should be noted that this paragraph implies that even where base maintenance is ordered on a case-by-case basis, there should be a written maintenance contract.</p>	<p>The intent of the this paragraph is not of course to require contracts to be approved by the Competent Authority for all line maintenance. The use of the word "unscheduled" is inappropriate.</p> <p>Text will be changed as requested.</p>
Paragraph - <input type="text"/>	
Cmt. ENAC	
<p>M.A.712 - Quality system .. (f) In the case of a small M.A. Subpart G organisation not related to a commercial air transport operator that does not have the privileges granted under M.A.711(b), the quality system can be replaced by performing organisational reviews on a regular basis.</p>	<p>EASA agrees on the comment from ENAC, nevertheless no modification is proposed at this stage as this paragraph will be affected by the NPA resulting from the RIA on Part-M</p> <p>The intent of this paragraph has never been to exempt commercial operator's continuing airworthiness management from having a quality system. For commercial operations Part-M is the transfer into the EU framework of JAR-OPS Subpart M. The maintenance management systems of all JAR OPS approved commercial operators were obliged to include a quality system, whatever the size of the operator. The way the paragraph was written seems to have led stakeholders to believe this rule had changed. To correct this, the proposed change will be taken into account with a slight modification.</p>
Paragraph - <input type="text"/>	
Cmt. ENAC	
<p>AMC M.A.202(a) Occurrence reporting .. For further details reference should be made to AMC 20-8</p> <p>AMC M.A.202(b) Occurrence reporting .. For further details reference should be made to AMC 20-8</p>	<p>At the time Part-M was written AMC 20 had not been finalised, therefore this reference could not be included.</p> <p>This inconsistency can now be corrected</p> <p>The text will therefore be changed as proposed.</p>

Comment

Response

Paragraph

-

Cmt. ENAC

1. remove reference to M.A.706(b) in the AMC M.B.702(a) point 1 and
 2. add reference to M.A.707

1. ...With the exception of the accountable manager , an EASA form 4 should be completed for each person nominated to hold a position required by M.A.707, M.A.706(<DELETE> , (c) and (d)

1. The accountable manager has never been required by JAR-OPS to be accepted by the Competent authority through a Form 4. During the transfer into the EU framework a typographical error was made wich seemed to indicate that the accountable manager must complete an EASA Form 4.

2. Airworthiness review staff, according to M.A 707(b), must be formally accepted. The normal process for doing so is through a Form 4. This seems to be have been omitted during the drafting of Part-M. This omission could potentially unnecessarily complicate the acceptance process.

The text will read as follows;

"With the exception of the accountable manager , an EASA form 4 should be completed for each person nominated to hold a position required by M.A.706 (c) and (d) and M.A.707"

Text chaned but not as proposed

Paragraph

-

Cmt. ENAC

AMC M.B.702(b) Initial Approval
 ..
 3. The competent Authority while investigating the acceptability of the Operators proposed sub-contracted continuing Airworthiness management tasks arrangements will take into account all other such contracts that are in place irrespective of state of registry in terms of sufficiency of resources, expertise, management structure, facilities and liaison between the Operator, the sub-contracted organisation and where applicable contracted Part -145 maintenance organisation(s).

Reason:

To provide additional guidance on acceptance of continuing Airworthiness management tasks arrangements which was already part of TGL34

The comment was analysed along with TGL34. It seems that this paragraph was omitted during the transfer of TGL34 into AMC-M.

This proposal compared to TGL34 is not clear who should be the object of these controls. Therefore it is proposed to add the term "in the subcontracted organisation" after "take into account".

The following text will be added:

"3. The competent Authority when investigating the acceptability of the Operators' proposed sub-contracted continuing airworthiness management tasks arrangements will take into account, in the subcontracted organisation, all other such contracts that are in place irrespective of state of registry in terms of sufficiency of resources, expertise, management structure, facilities and liaison between the Operator, the sub-contracted organisation and where applicable contracted Part -145 maintenance organisation(s)."

Comment	Response
<p>Paragraph - [redacted]</p> <p>Cmt. <i>LBA</i></p>	<p>There have been misunderstandings among stakeholders on difference between service life limit and certified life limit, though, this seemed clearly drafting. To avoid any misunderstanding, the proposed modification to M.A. 503 is drafted below. This proposal does not change the intention of the rule.</p> <p>M.A. 503:</p> <p>Installed service life limited components shall not exceed the approved service life, as specified in the approval maintenance programme and airworthiness directives. The approved service life is expressed in calendar time, flight hours or cycles as appropriate. At the end the approved service life the component must be removed from the aircraft for maintenance or disposal in the case of components with a certified life limit.</p>
<p>Paragraph - [redacted]</p> <p>Cmt. <i>LBA</i></p> <p>Add: An aircraft maintenance licence becomes invalid two years after its last issue, if the holder is not working in a Part-M Subpart F or Part-145 organisation. For the renewal the holder has to show evidence to the competent authority, that he has either had experience in the inspection, servicing or maintenance of an aircraft or components in accordance with the privileges granted by the licence held for not less than six month, or has met the provision for the issue of a licence with the appropriate privileges in the last 24 month.</p>	<p>This issue cannot be included in this NPA as is not a editorial or minor change, nor was it subject to consultation. Nonetheless EASA is aware of this issue and has included in its Rulemaking programme under item 66.008 a task that is to address this issue.</p>
<p>Paragraph - [redacted]</p> <p>Cmt. <i>LBA</i></p> <p>The format of the EASA Form 26 will be changed in Appendix V. LBA (CAA Germany) has 5.000 pre-printed EASA Form 26, old format: We have issue EASA Form 26 with the old format. since 01st January 2005, too. LBA will start to use the new format, when all 5.000 pre-printed EASA Form 26 are used. The old EASA Form 26 will replaced, when certificates are renewed.</p>	<p>Article 2 of Regulation 1592/2002 sets the Agency objectives. One of them is to assist Member States in fulfilling their obligations under the Chicago Convention. The EASA Form 26 does not comply with ICAO Annex 1. It is therefore the Agency obligation to correct this. EASA is therefore unable to change this but you could use these preprinted copies until the amending Regulation is adopted.</p>
<p>Paragraph - [redacted]</p> <p>Cmt. <i>LBA</i></p> <p>Will be an explanation available for 'service life' in the European rules? (e.g. Article 2 of CR (EC) No 2042/2003)</p>	<p>There have been misunderstandings among stakeholders on difference between service life limit and certified life limit, though, this seemed clearly drafting. To avoid any misunderstanding, the proposed modification to M.A. 503 is drafted below. This proposal does not change the intention of the rule.</p> <p>M.A. 503:</p> <p>Installed service life limited components shall not exceed the approved service life, as specified in the approved maintenance programme and airworthiness directives. The approved service life is expressed in calendar time, flight hours or cycles as appropriate. At the end the approved service life the component must be removed from the aircraft for maintenance or disposal in the case of components with a certified life limit.</p>