



EASA

European Aviation Safety Agency



Workshop

09.-10. October 2008

From JARs to IRs - Requirements for
Organisations and Authorities

The Comment Response Tool

Matthias Borgmeier
Rulemaking Officer - EASA



European Aviation Safety Agency

The Comment Response Tool




European Aviation Safety Agency - easa.europa.eu - Microsoft Internet Explorer


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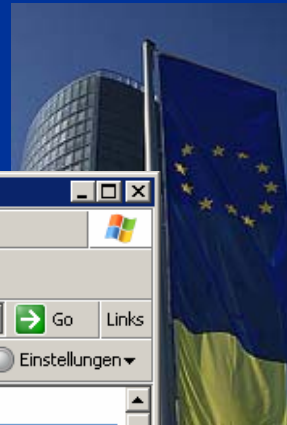
BC Европейска агенция за авиационна безопасност
CS Evropská agentura pro bezpečnost letectví
DA Det Europæiske Luftfartssikkerhedsagentur
DE Europäische Agentur für Flugsicherheit
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NL Europees Agentschap voor de veiligheid van de luchtvaart
PL Europejska Agencja Bezpieczeństwa Lotniczego
PT Agência Europeia para a Segurança da Aviação
RO Agenția Europeană de Siguranță a Aviației
SK Európska agentúra pre bezpečnosť letectva
SL Evropska agencija za varnost v letalstvu

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European Aviation Safety Agency (EASA)

The European Aviation Safety Agency is the centrepiece of the European Union's strategy for aviation safety. Our mission is to promote the highest common standards of safety and environmental protection in civil aviation.

A common strategy

Air transport is one of the safest forms of travel. As air traffic continues to grow a common initiative is needed at the European level to keep air transport safe and sustainable. The Agency develops common safety and environmental rules at the European level. It monitors the implementation of standards through inspections in the Member States and provides the necessary technical expertise, training and research. The Agency works hand in hand with the national authorities which continue to carry out many operational tasks, such as certification of individual aircraft or licensing of pilots. ([read more...](#))



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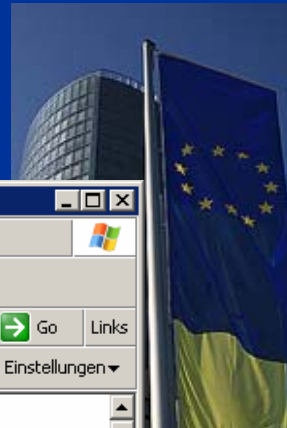
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Rulemaking | Notices of Proposed Amendment (NPAs) - Microsoft Internet Explorer

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Rulemaking - Notices of Proposed Amendment (NPAs)

Agency Rulemaking process

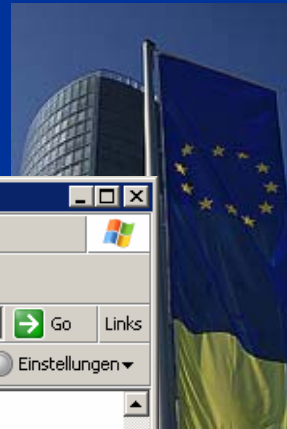
1	Determination and approval of the Rulemaking programme	6-24 months
2	Initiation of the rule by defining the Terms Of Reference	
3	The drafting of the rule	
4	Consultation phase	3 months
5	Comments and review period	3 months

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Rulemaking | Notices of Proposed Amendment (NPAs) - Microsoft Internet Explorer

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The Agency has developed a Comment Response Tool (CRT) that will be used to automate the consultation process for Notices of Proposed Amendments (NPA) and Comment-Response Documents (CRD). The CRT allows users to review NPAs and place their comments, and later on to view the CRDs and add their reactions before the publication of the final Decision or Opinion.

To access the CRT go to <http://hub.easa.europa.eu/crt/>

JAA NOTICES OF PROPOSED AMENDMENT

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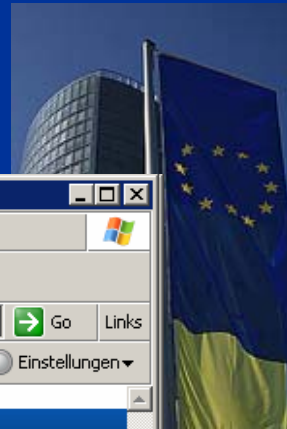
NPA Table				
NPA NR.	TITLE	DATE PUBLISHED	END OF COMMENT	COMMENT FORM / CRT
NPA 2008-19	"Fuel Tank Flammability Reduction"	2008-07-22	2008-10-18	Please place reactions using the CRT
NPA 2008-18	Access through bulkheads	2008-06-13	2008-09-13	Please place reactions using the CRT
NPA 2008-17a NPA 2008-17b NPA 2008-17c	Implementing Rules for Pilot Licensing A. Explanatory Note and Appendices B. Part-FCL C. Part-Medical	2008-06-05	2008-09-05 2008-10-15 In accordance with article 6.6 of the MB decision 08-2007, the Agency extended the consultation period for an additional 40 days to the importance	Please place reactions using the CRT

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NOTE: Outstanding CRDs to NPAs from 2005 and 2006 will continue to be published **only** on the Agency [website](#), individual notifications cannot be sent to registered CRT users for these CRDs.

The [Agency](#) has developed a Comment Response Tool (CRT) that will be used to automate the consultation process for Notices of Proposed Amendments (NPA) and Comment-Response Documents (CRD). The CRT allows users to review NPAs and place their comments, and later on to view the CRDs and add their reactions before the publication of the final Decision or Opinion.

During a transition period users can still [send comments by e-mail](#) using a comment form. This transition period ends on the 7th of September 2007, when the commenting period for NPA 2007-05 comes to an end. Starting with NPA 2007-06, submitting comments is possible using the CRT only. In case the use of CRT is prevented by technical problems these should be reported to the [webmaster](#) and [comments sent by email](#) instead.

[Registration](#) is required to place comments. All registered users have the possibility to receive notifications whenever a new NPA or CRD is published.

Once a comment is saved it is allocated a unique number which confirms the comment was successfully saved. This number will also be used in the CRD. While the consultation is open the users can still modify their comments. A detailed [User Guide](#) is provided to help users become familiar with CRT.

Technical details

The CRT is a web-based application. It has been successfully tested on Internet Explorer 6+ (SP2 **must** be installed) and Firefox 1.5+. Documents in the CRT will be provided in two formats; Acrobat (.pdf) and FlashPaper (.swf). The required programs, Adobe Reader and Adobe FlashPlayer, are available for free download, see links below.

[Get ADOBE READER](#) [Get ADOBE FLASHPLAYER](#)

Important Notice Regarding FCL NPA

The FCL NPA consultation period has been extended until 15 October.

Due to the large size of NPA 2008-17b (Part-FCL), it might take a few minutes for the document to load, so please be patient.

In case you get a "script warning" while the document is loading, please allow the script to continue to run.

We apologise for the inconvenience.

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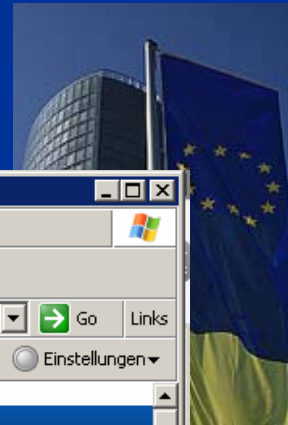
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Status	Task numbers	Title	Number	Affected rules & codes	Begin	End
CMT	25.056(b)	Fuel tank flammability reduction	NPA 2008-19	CS-25 Part-21	2008-07-18	2008-10-18
CMT	25.045	Access through bulkheads	NPA 2008-18	CS-25	2008-06-13	2008-09-13
CMT	FCL.001	Implementing Rules for Pilot Licensing - Part-Medical	NPA 2008-17c	Part-MED Part-MED AMC/GM	2008-06-05	2008-10-15
CMT	FCL.001	Implementing Rules for Pilot Licensing - Part-FCL	NPA 2008-17b	Part-FCL Part-FCL AMC/GM	2008-06-05	2008-10-15
CMT	FCL.001	Implementing Rules for Pilot Licensing - Explanatory Note and Appendices	NPA 2008-17a	Part-FCL Part-FCL AMC/GM Part-MED Part-MED AMC/GM	2008-06-05	2008-10-15
CMT	BR.004	Essential Requirements for Civil Aviation Environmental Protection	NPA 2008-15	Basic regulation CS-34 CS-36 Part-21	2008-05-30	2008-11-15
CMT	20.003	Airworthiness and Operational Approval for on board equipment related to Required Navigation Performance/Area Navigation (RNP/RNAV) Approach Operations	NPA 2008-14	AMC-20	2008-05-28	2008-08-28
RSP	MDM.022b	'Fuel Tank Safety'	NPA 2008-16	Part-145 Part-147 Part-21 Part-66 Part-M	2008-05-30	2008-07-11
RSP	25.006	Thermal/Acoustic Insulation Material	NPA 2008-13	CS-25	2008-05-21	2008-08-21
RSP	21.027	Repair and design changes to European Technical Standard Order (ETSO)	NPA 2008-12	Part-21 Part-21 AMC/GM	2008-05-19	2008-08-19

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European Aviation Safety Agency

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EASA CRT application - Implementing Rules for Pilot Licensing - Part-FCL - Comments - Microsoft Internet Explorer

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Title Implementing Rules for Pilot Licensing - Part-FCL
NPA Number NPA 2008-17b

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Page	Description	Comment #
-	(General Comments)	
1	TITLE PAGE	
2	TABLE OF CONTENTS	
3	B. PART-FCL	
3	B. DRAFT OPINION PART-FCL	
3	B. Draft Opinion Part-FCL - Subpart A: General Requirements	
3	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.001 Competent authority	
3	B. Draft Opinion Part-FCL - Subpart A: General Requirements - FCL.005 Scope	
	B. Draft Opinion Part-FCL - Subpart A: General	

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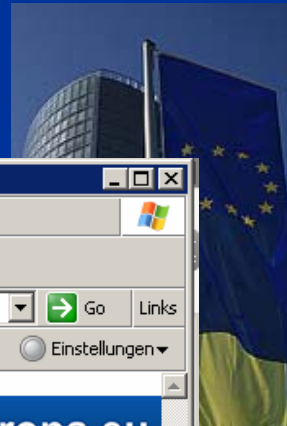
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WP 2530-270 3 Jun 2008

SUBPART B
LEISURE PILOT LICENCE - LPL

SECTION 1
Common Requirements

FCL.100 LPL - Minimum age
Applicants for the LPL shall be at least 16 years of age.

FCL.105 LPL - Privileges and conditions
(a) General. The privileges of the holder of a LPL who is not allowed remuneration or pilot-in-command in non-commercial operations within the appropriate aircraft category engaged.
(b) Conditions. Applicants for the LPL shall have fulfilled the requirements for the relevant aircraft category and, when applicable, for the class or type of aircraft used in the last 12 months.
FCL.110 LPL - Crediting for the same aircraft category
(a) Applicants for a LPL who have held another licence in the same category of aircraft shall be fully credited towards the requirements of the LPL in that category of aircraft.
(b) Without prejudice to the paragraph above, if the applicant's licence has lapsed for more than 1 year, the holder shall have to pass a test for the issue of a LPL in the appropriate aircraft category.
FCL.115 LPL - Training course
Applicants for a LPL shall complete a training course within an approved training organization. The course shall include theoretical knowledge and flight instruction appropriate to the privileges given.
FCL.120 LPL - Theoretical knowledge examination
(a) Applicants for a LPL shall have demonstrated to the competent authority a level of theoretical knowledge appropriate to the privileges granted, through examinations in the following:
(1) general subjects:

- Air law;
- Human performance;
- Meteorology; and
- Communications;

(2) specific subjects concerning the different aircraft categories:

- Principles of flight;
- Operational procedures;
- Night performance and planning;
- Aircraft general knowledge; and
- Navigation.

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11	and certificates	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements	Add comment
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements - FCL.100 LPL - Minimum age	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements - FCL.105 LPL - Privileges and conditions	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements - FCL.110 LPL - Crediting for the same aircraft category	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements - FCL.115 LPL - Training course	
11	B. Draft Opinion Part-FCL - Subpart B: Leisure Pilot Licence - LPL - Section 1: Common Requirements - FCL.120 LPL - Theoretical knowledge examination	

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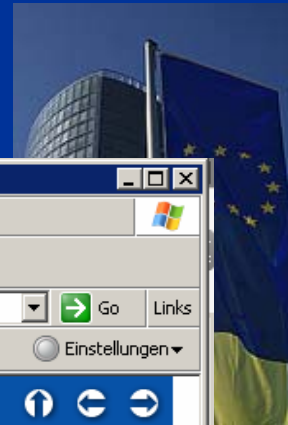
Micros...

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19:22



The Comment Response Tool



EASA Comment/Response Tool

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 - Document workflow and terminology
 - Using the CRT application**
- How to...

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Using the CRT application

The CRT application is a web-based application. Although it should work in most modern browsers, it has been tested on Microsoft Internet Explorer 6+ (Service Pack 2 must be installed) and Mozilla Firefox 1.5+.
You will need to have Javascript and cookies enabled on your browser. You will also need to make sure that you have the free Adobe [Flash Player](#) and [Reader](#) installed.

Within the application, most actions on tabular data (documents, segments, comments, etc.) are accessible through a right-click context menu on a particular row. When you right click on any row, a different menu of actions will appear depending on where you clicked and what your user rights are.

	Number	Affected rules & codes	Begin	End
(D To C)	NPA 2006-04	AMC-20 Basic regulation 1592/2002	2007-05-24	2007-08-24
	NPA 2006-1	CS-AP CS-De	2007-05-18	2007-08-18
	NPA 2007-01	CS-22 CS-23	2007-04-04	2007-07-16

Some actions (for example, adding a comment) require that some data be sent to the application database. In many cases, while such communication is taking place, you will see this icon and a "Please wait..." message. You will not see the results of your action until this icon and message disappear. The waiting time depends on your connection speed, the load on the application server, etc.

Hint: To ensure that you are taking advantage of all the available screen space, particularly when working in the [comments view](#), you can press the F11 key, which on many browsers will result in the web page window taking up the whole screen. The CRT application will automatically scale to the width and height of your browser window.

Please bear in mind that, as with all web applications, some of the images used in this guide may not reflect exactly what you see in your browser/operating system.

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Edit an existing comment

To edit one of your comments on an NPA, you need to be in the [comments view](#).

You can edit a comment in two ways:

1. Click on the comment number in the "Comment #" column, or
2. Right-click on a segment row and select "Edit comment". If there are more than one comments on that segment, the menu item will be expanded so that you can select the comment number representing the comment you wish to edit.

Comment #	Comment	Reactions
3	A. I. General	
3	A. I. 1	3 4
3	A. I. 2	
3	A. I. 3	
3	A. I. 4	
3	A. II. Consul	
3	A. II. 5	
3 - 4	A. II. 6	
4	A. III. Comment response document	

You will then be presented again with the editor view, where you can edit the text of your comment and/or add/manage your [attachments](#).

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Status	Task numbers	Title	Number	Affected rules & codes	Begin	End
RSP	MDM.040	De-icing/anti-icing fluids	A-NPA 2007-11	Part-145 AMC/GM Part-M AMC/GM	2007-07-31	2007-10-31
RSP	145.012	Part-145 single and multiple releases	NPA 2007-09	Part-145 Part-145 AMC/GM Part-66 Part-66 AMC/GM Part-M Part-M AMC/GM	2007-06-28	2007-10-28
RSP	66.006 66.009 66.011	Privileges of B1 and B2 aircraft maintenance licenses and Type and group ratings and Type training	NPA 2007-07	Part-145 Part-145 AMC/GM Part-147 Part-147 AMC/GM Part-66 Part-66 AMC/GM	2007-06-28	2007-10-28
CRD	27&29.012	Advisory Circulars Revision (AC Revision)	NPA 2007-17	CS-27 CS-29 CS-VLR	2008-08-22	2008-10-22
CRD	ETSO.002	Systematic review and transposition of existing FAA TSO standards for parts and appliances to be used on civil aircraft into EASA ETSO.	NPA 2007-14	CS-ETSO	2008-08-07	2008-10-07
CRD	25.008(c)	Flight in Icing Conditions	NPA 2008-05	CS-25	2008-08-06	2008-10-06
CRD	ETSO.001	Validation of ...	NPA 2007-10	CS-ETSO	2008-08-04	2008-10-04
CRD	MDM.007	Authorised R ...	NPA 2007-13	Part-145 Part-145 AMC/GM Part-21 Part-21 AMC/GM Part-M Part-M AMC/GM	2008-07-25	2008-09-25
CRD	66.003	Appendix 1 Aircraft type ratings for aircraft maintenance licence	NPA 2007-18	Part-66 AMC/GM	2008-07-11	2008-09-11
PRP	36.005 BR.006	CAEP/7 Implementation	NPA 2008-02	Basic regulation CS-36	2008-06-26	2008-08-26

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CRD 2008-05[1].pdf - Adobe Reader

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consultation with stakeholders on this issue and intend to harmonize with the final EASA standards resulting from this rulemaking.

response *Noted*

comment 9 comment by: *Airbus*

While reviewing, in conjunction with NPA 2008-05, the current CS-25 text resulting from NPA 16/2004, we detected a few typo errors that may be misleading and need to be corrected:

1/ In AMC 25.21(g), subparagraph 6.9.4.3.c.iii has to be renumbered 6.9.4.3.d Reason: the intent of the rule is not to combine 0g maneuver with steady heading sideslips at full rudder authority, with holding ice. Thus subparagraph iii should be clearly separated from the remainder of paragraph c.

2/ In AMC 25.21(g), paragraphs 6.9.5.1 and 6.18.3.1 must refer to paragraph A1.2.3.4.a, instead of A1.2.3.3.a of Appendix 1.

3/ In AMC 25.21(g), paragraphs 6.9.5.2 and 6.18.3.2 must refer to paragraphs A1.2.3.4.b,c,d or e, instead of A1.2.3.3.b,c,d or e of Appendix 1.

response *Accepted*

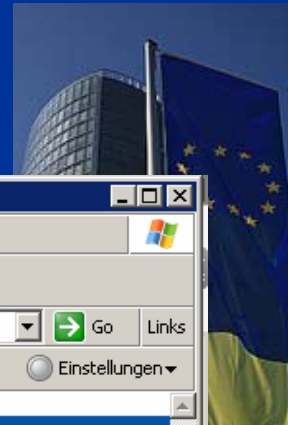
1/ The text is amended as proposed. It would also align with FAA AC 25.25.

2&3/ Editorial correction accepted.

resulting text AMC 25.21(g)
Performance and Handling Characteristics in Icing Conditions Contained in Appendix



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Status	Task numbers	Title	Number	Affected rules & codes	Begin	End
PRP	22.004	Cockpit crashworthiness	NPA 2007-12	CS-22	2008-04-03	2008-06-03
PRP	66.004	Time limit for demonstrating compliance with knowledge and experience requirements	NPA 2007-02	Part-147 Part-66	2008-04-01	2008-06-01
PRP	MDM.002	Electrical Wiring Interconnection System	NPA 2007-01	AMC-20 CS-25 Part-M Part-M AMC/GM	2008-03-06	2008-05-06
PUB	BR.003	Extension of the EASA system to the regulation of Air Traffic Management and Air Navigation	NPA 2007-16	Basic regulation		
PUB	M.005	Revised Part-M and Pilot ownership	NPA 2007-08	Part-21 Part-M Part-M AMC/GM		
PUB	M.017					
PUB	21.023(c)	Permit to Fly and Approved Maintenance Organisations		Opinion 01/2008 /GM Part-M		
PUB	20.006	Miscellaneous improvements to AMC-20 (Part 1: A)		Attachment 1 to Opinion 01/2008 - Essential Requirements		
PUB	66.008	Re-issuance of the Part-66 Aircraft Maintenance Licence	NPA 2007-04	Attachment 2 to Opinion 01/2008 - RIA Part-66 AMC/GM		
PUB	21.021	Resolving ambiguity between AMC/GM and Part 21 in respect of eligibility for Subpart F and G for manufacturers of raw material	NPA 2007-03	Part-21 AMC/GM		

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European Aviation Safety Agency

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Please use this opportunity to
take part in the rulemaking
process !

Thank you for
your attention !

Matthias Borgmeier - EASA

