

CRD - AMC to Part M

Comment	Response
SECT A SUB B - AMC M.A.201	
Paragraph (d)	
Cmt. 29 / CAA-UK	
There is now no AMC for a pre-flight inspection which means this document no longer encompasses the contents of the AMC to JAR OPS 1.890(a)(1).	The AMC to JAR OPS 1.890(a)1 is now AMC M.A.301 -1 Continuing airworthiness No text changed.
Paragraph (h)	
Cmt. 15 / Lufthansa Technik AG	
In AMC M.A.201 (h), Responsibilities, no reference is provided to M.A.201 (h) 2.: "be approved in accordance with Part 145 or contract such an organisation". Consequently, there is no guidance provided concerning the maintenance contract. For the time being, JAA Leaflet 15, JAR OPS1 and 3 Subpart M Contracted Maintenance provide guidance on that issue. We recommend to incorporate M.A. 201 (h) 2 into AMC M.A.201 (h) and to make reference to an Appendix (to be integrated), which covers the content of Leaflet 15. Note: For example: AMC M.A.201 (h) 1 provides already a similar reference under: 12.Appendix 2 provides information on the sub-contracting of continuing airworthiness management.	TGL 34 dealt with responsibilities of operators and sub-contracting certain tasks without diluting this responsibility. TGL 15 dealt with the technical elements required in the contract. This is part of the AOC and therefore is contained in subpart G M.A.708(c) and associated AMC. No text changed
Cmt. 16 / Lufthansa Technik	
In AMC M.A.201 (h), Responsibilities, no reference is provided to M.A.201 (h) 2.: "be approved in accordance with Part 145 or contract such an organisation". Consequently, there is no guidance provided concerning the maintenance contract. For the time being, JAA Leaflet 15, JAR OPS1 and 3 Subpart M Contracted Maintenance provide guidance on that issue. We recommend to incorporate M.A. 201 (h) 2 into AMC M.A.201 (h) and to make reference to an Appendix (to be integrated), which covers the content of Leaflet 15. Note: For example: AMC M.A.201 (h) 1 provides already a similar reference under: 12.Appendix 2 provides information on the sub-contracting of continuing airworthiness management.	TGL 34 dealt with responsibilities of operators and sub-contracting certain tasks without diluting this responsibility. TGL 15 dealt with the technical elements required in the contract. This is part of the AOC and therefore is contained in subpart G M.A.708(c) and associated AMC. No text changed
Cmt. 32 / The Royal Aeronautical Society	
Sub-paragraph 2: "The performance of de-icing and anti-icing activities does not require an Part-145 approval.", should be amended to read "The performance of ground de-icing and ground anti-icing activities does not require an Part-145 approval."	Text changed.
Paragraph (h) 1 4 (a)	
Cmt. 16 / Lufthansa Technik	
Replace "...and/or..." by "...or..." only. The term and/or is unprecise.	The current text is deemed to adequately cover the situation where both (a) and (b)are applicable. No text changed.

Comment	Response
Paragraph (h) 1 par 6	
Cmt. 20 / CAA Netherlands <p>This AMC lists limitations regarding sub-contracted tasks (par. 6 a - e). This is copied from TGL 34 (Subcontracted Technical Services) par. 4.1. however without: (f) Etc. (the list is not exhaustive). Therefore the AMC is more restrictive. The AMC refers to Appendix 2 (copied from TGL 34, Subcontracted Technical Services). Based on appendix 2 however looks possible to subcontract more activities as listed in AMC M.A. 201 (h) 1. E.g. Appendix 2 par. 2.15 makes it possible for subcontracted organizations to maintain and keep maintenance records. According to AMC M.A. 201 (h) 1 this is not possible.</p> <p>Proposed text: To stay in line with today's regulations requirements, add to AMC M.A. 201 (h) 1 par. 6. (f) Etc. (the list is not exhaustive).</p>	<p>A new paragraph(f) has been added taking into account the comment and expanding AMC M.A.201(h)1,6. Text changed.</p>
Paragraph (h) 1 para 13	
Cmt. 18 / DGAC, France <p>§13. The competent authority should signify the acceptance of the contract on the AOC Reference of the contract(s) should be included in the continuing airworthiness management exposition</p> <p>JUSTIFICATION: The exposition is approved under M.A.704(b) and there is no need to surcharge the AOC</p>	<p>The content of Form 14 or the elements of the AOC are already included in the rule and therefore cannot be changed. Text changed but not as requested.</p>
Paragraph (h) 1 para 4	
Cmt. 18 / DGAC, France <p>§4. Part-M does not provide for organisations to be independently approved to perform continuing airworthiness management tasks on behalf of commercial air transport operators. The approval of such activity is vested in the operator's air operator's certificate (AOC). Commercial air transport operators may subcontract certain continuing airworthiness management tasks to M.A. Subpart G approved subcontractors. The subcontracted organisation is considered to perform the continuing airworthiness management tasks as an integral part of the operator's continuing airworthiness management system irrespective of any other approval held by the subcontractor including a M.A. Subpart G approval. even if the sub-contractor is MA Subpart G approved.</p> <p>4.JUSTIFICATION: See DGAC comments n°9 on M.A. 201 It would not be acceptable that the M.A. subpart G approval of the subcontractor is suspended without any impact on the operator's AOC</p>	<p>The proposal seems to dilute the operators responsibilities and goes against the declared objective. In fact an operator can subcontract to any organisation approved or not. As written, only the operator is responsible. No text changed.</p>
Paragraph (h) 1 para 9	
Cmt. 18 / DGAC, France <p>§9. Contracts should not authorise the sub-contracted organisation to sub-contract to other organisations elements of the continuing airworthiness management tasks without the acceptance from the contracting operator and the competent authority.</p> <p>JUSTIFICATION: Subcontracting of specific tasks such as read out of DFDR should not be forbidden but adequately controlled.</p>	<p>In this case, the operator should subcontract directly. There is no need for second subcontracting. It dilutes the operators responsibility. No text changed.</p>

Comment	Response
Paragraph (h) 1-13	
Cmt. 20 / CAA Netherlands	
CAA-NL suggests this should be placed in section B, it is an obligation of the Authority	Text changed.
Paragraph (h) 3	
Cmt. 25 / LBA, Germany	
For all given options the complexity of the intended operation should be considered. This should prevent additional complexity if different approved maintenance organisation need to be involved.	This is existing AMC to JAR OPS 1.895(a) text. No text changed.
Paragraph (h) 3 para 204	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).	This is existing AMC to JAR OPS 1.895(a) text. No text changed.
Paragraph (h) para 1	
Cmt. 34 / ASA Sweden	
Propose to delete paragraph. The AMC seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).	This is not a definition but is intended to avoid any confusion. No text changed.
Paragraph (h) responsibilities 3	
Cmt. 21 / ERA	
This paragraph states that the operator is responsible for determining what maintenance is required. Whilst accepting that it is the responsibility of the operator to ensure that all required maintenance is performed when due, the responsibility for determining the maintenance requirements surely are a partnership between the aircraft manufacturer, the operator and the Competent Authority. How would the agency respond to this?	It is the operators responsibility to determine the maintenance needed based on T holder and manufacturer data and any other data issued or approved according to Part-21. Final responsibility always lies with the operator in all cases.
Paragraph (h)(1) item 4	
Cmt. 22 / KLM	
It should be stated clearly that it is possible for a commercial Operator with a ECAR-M subpart G approval but without the optional airworthiness review approval to contract the performance airworthiness reviews to another organization with an airworthiness review approval (for instance, to an ECAR-145 organization with an ECAR-M subpart G airworthiness review approval only)	M.A.201(h)1 addresses continuing airworthiness management for operators. The airworthiness review is addressed in Subparts G and I. Part-145 does not give privileges for this activity. No text changed.
Paragraph (h)(1) item 5	
Cmt. 22 / KLM	
Item (5) should be amended by adding a point (c). Point (c) should read: "by setting a clear standard and monitoring that this standard is adhered to by the subcontracted organization."	The operator must retain its responsibilities through active control of the tasks. The proposal is not in line with the policy agreed in JAA working groups. No text changed.

Comment

Response

Paragraph (h)1. 4. (a)

Cmt. 15 / Lufthansa Technik AG

Replace "...and/or..." by "...or..." only.
The term and/or is unprecise.

The current text is deemed to adequately cover the situation where both (a) and (b) are applicable.

No text changed.

Comment	Response
SECT A SUB B - AMC M.A.202	
Paragraph [redacted]	
Cmt. 2 / <i>British Airways</i>	
(d) Reports must be made as soon as practicable but in any case within 72 hours of the person or organisation maintaining the aircraft identifying the condition to which the report relates. A copy of the report must be retained in either hard copy or electronic format Ground occurrence not necessarily aircraft tail specific and therefore could not be retained as part of the airworthiness record for a particular aircraft registration	This is a comment to the rule which has been amended. No text changed.
Cmt. 5 / <i>Monarch Aircraft Engineering Ltd</i>	
(d) Reports must be made as soon as practicable but in any case within 72 hours of the person or organisation maintaining the aircraft identifying the condition to which the report relates. A copy of the report must be retained in either hard copy or electronic format There is no benefit in keeping reports in the aircraft records. Currently these are used in reliability databases for analysis and should be retained by the organisation/customer but do not need to be filed individually in aircraft records.	This is a comment to the rule which has been amended. No text changed.
Paragraph (a)	
Cmt. 22 / <i>KLM</i>	
This is a new item in relation to JAR-OPS subpart M and was also not mentioned in ECA M draft 3.3 (comment version). So why is this JAR-OPS subpart D item (1.420) now in ECAR-M, and if the intention is to reproduce JAR-145-60 in ECAR-M please make a better distinction between Operator required reportable occurrences and AMO required reportable occurrences. Also we don't understand, what in this context, an accountable person or organization is	Only the airworthiness issues from JAR OPS subpart D have been transferred into Part-M. This is due to the fact that Part-M regulates all aircraft not only those which are commercially operated and that all aircraft should be subject to occurrence reporting on these continuing airworthiness issues. No text changed.
Paragraph (b)	
Cmt. 25 / <i>LBA, Germany</i>	
add following text to the listing of required minimum information contained in the reporting form: "- in respect of maintenance the maintenance program reference for the task that detects the hazardous condition."	This is deemed to be covered by the term "details of the occurrence". No text changed.
Paragraph (h)(1) <i>item 13</i>	
Cmt. 22 / <i>KLM</i>	
This is a new item in relation to JAR-OPS, suggest changing the existing sentence: The competent authority should signify the acceptance of the contract, by mentioning the name of the sub-contracted airworthiness management tasks organization on the AOC/MSAS. Reason: This is more in line with current practice.	The content of Form 14 or the elements of the AOC are already included in the rule and therefore cannot be changed. This was already the case in the JAA system under TGL 34. Text changed but not as requested.
Paragraph (h)(1) <i>item 6</i>	
Cmt. 22 / <i>KLM</i>	
Item (6) should be amended by adding a point (f). Point (f) should read: "Record keeping activities"	A new paragraph(f) has been added taking into account the comment and expanding AMC M.A.201 (h) 1,6. Text changed.

Comment

Response

Paragraph (h)(1) item 9

Cmt. 22 / KLM

Item (9) should be amended by adding the following words:
"Contracts should not authorize the sub-contracted organization to sub-contract to other organizations any substantial elements of the continuing airworthiness management tasks."
Reason: Sometimes data processing tasks (like engine trending) are performed by another organisation. Interpretation and proposing actions remain with organisation subcontracted by Subpart G approved organisation.

In this case, the operator should subcontract directly. There is no need for second subcontracting. It dilutes the operators responsibility.
No text changed.

Comment	Response
SECT A SUB C - AMC MA.301	
Paragraph (b) paragraph 1	
Cmt. 29 / CAA-UK	
It is suggested changing the text to the following to improve clarity: – 1. "When assessing aircraft maintenance programmes for approval, the competent authority should verify that the maintenance programme is acceptable for the continued airworthiness of the specific aircraft listed and it is appropriate for the proposed operating environment and schedule utilization".	Text changed.
Paragraph 1	
Cmt. 25 / LBA, Germany	
It should be made clear that the activities under No. 2 are not applicable for commercial air transport unless the staff involved has received the necessary training as required by Part 66.	This is existing AMC OPS 1.890(a)(2) text and it was not deemed necessary in the JAA system to require JAR 66 qualified personnel to carry out this activity. No text changed.
Paragraph 4 & -7	
Cmt. 22 / KLM	
The words "with regards to spares" should be omitted from the sentence and could be replaced by "component reliability" if that is the intention of this text.	This is existing AMC OPS 1.890(a)(4) text. No text changed.
Paragraph 5	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M). Delete "made mandatory by the Agency".	This is not a definition. "made mandatory by the Agency" is a reference to the Part text. No text changed.

Comment	Response
SECT A SUB C - AMC MA.302	
Paragraph [redacted]	
Cmt. 25 / LBA, Germany	
Statements 3. and 5. should be part of the regulation and if this not possible be more emphasised („shall“ or preferably „must“)	These are not requirements. Paragraphs 3 and 5. They are an acceptable means of compliance but other means of achieving M.A.302 may be acceptable. No text changed.
Paragraph (c)	
Cmt. 25 / LBA, Germany	
Add an additional paragraph „Repetitive maintenance tasks derived from modifications or repairs should be incorporated in the owner or operator’s maintenance programme.“	Text changed.
Cmt. 25 / LBA, Germany	
add new paragraph to item 1. „Revisions of the relevant documents need to be considered by the owner or operator for inclusion in the maintenance programme during the periodical review. Applicable mandatory requirements for compliance with Part-21.A.61 shall be incorporated into the owner or operator’s maintenance programme as soon as possible.“	Text change in AMC M.A. 302 (3).
Paragraph (c) (1)	
Cmt. 12 / BMV Austria	
Delete last sentence: “Furthermore, an owner or operator`s maintenance programme should also take into account.....data containing information on scheduling for components.“	Aircraft manufacturers do not always issue data for the planning of the maintenance of components. For example, the owner of an aircraft may completely change the avionics on an aircraft. The Instructions for Continued Airworthiness of such avionics components would not be covered by the aircraft manufacturer’s data. No text changed.
Paragraph (c) (2)	
Cmt. 12 / BMV Austria	
Delete: “competent authority or the”	Instruction issued by the competent authority are not AMC or guidance material but technical instructions. These include for example the overhaul periods on piston engine aircraft or the Light Aircraft Maintenance Schedule published by the CAA-UK Text changed but not as proposed.
Paragraph (d) 6	
Cmt. 20 / CAA Netherlands	
The reverved paragraph reveres to Appendix 1 for guidance on reliability programmes. Appendix 1 contains unfortunately no guidance on reliability programmes.	Text changed.

Comment	Response
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Paragraph **Appendix 1**

Cmt. **31 / Martinair Holland NV**

Appendix 1 to AMC M.A.302 differs form Appendix 1 to JAR-OPS 1.910 a & b 1.1.12, 1.1.13 and 1.1.14 are different. This results in the fact that all the Operator Maintenance Programme should be amended to meet the requirement of Appendix 1 to AMC M.A.302 and AMC M.B.301(b) We recommend to use the text of Appendix 1 to JAR-OPS 1.910 a & b for 1.1.12, 13 and 14 or define a period in which all maintenance programme can be amended to meet the requirement of Appendix 1 to AMC M.A.302 and AMC M.B.301(b)

These changes take into account the latest amendments to JAR-OPS to reflect S 88 and ageing aircraft structures. Furthermore, there is mainly a change in form rather than a change in content. Finally, the regulation now provides for a two year transition periode for operators.
No text changed.

Comment	Response
SECT A SUB C - AMC MA.305	
Paragraph [redacted]	
Cmt. 2 / British Airways	
(d) The Operator shall maintain records in a method acceptable to the NAA that consist of the current: Reason for change: Operators of large Fleets of aircraft have introduced electronic methods of recording some of the data specified.	This aspect is covered by the AMC M.A.305(h). No text changed.
Cmt. 2 / British Airways	
Note below to be added to MA 305 It is acceptable for the operator to use NAA approved alternative methods in lieu of log books for recording up to A checks, subject to the information being readily accessible. Reason for change: Operators of large Fleets of aircraft have introduced electronic methods of recording the data specified. To record this daily into log books is not practical and would prove to be unworkable for large carriers flying several sectors each day.	This aspect is covered by the AMC M.A.305(h). No text changed.
Paragraph (d)	
Cmt. 25 / LBA, Germany	
In order to facilitate the verification of the airworthiness status of an aircraft for repetitive AD's all performance dates/times/cycles during the last review period shall be available together with the data for the initial performance.	The AMC already covers the intent of the proposal. No text changed.
Paragraph (d) h	
Cmt. 25 / LBA, Germany	
Replace 'aeroplane' with 'aircraft' because helicopters, airships etc. should be included.	Text changed.
Paragraph (h)	
Cmt. 21 / ERA	
Sub-paragraph 4 states that the computer back-up system should be updated at least within 24 hours of any maintenance. This paragraph is unclear. The phrase "at least" would imply that it can be in excess of 24 hours. However, it is our opinion that what is meant by this paragraph is that the computer back-up system should be updated within 24 hours of any maintenance. If this is the intent of this paragraph, this would be far too restrictive. It is impractical to require that all computer based records are updated within 24 hours of a major input. The sheer volume of data entry to be completed for such a check would make this impossible. Could the agency please clarify the meaning of this paragraph, taking into consideration the earlier comments?	This was existing AMC OPS 1.920 text. No text changed.
Cmt. 25 / LBA, Germany	
To trace the total time in service of any aircraft part and component is the general responsibility of the G1 – Maintenance Management Organisation. The text of AMC M.A:614 (a) 2 should also be included in AMC M.A.305 (h).	Text changed.

Comment

Response

Paragraph (h) 6

Cmt. 34 / ASA Sweden

The AMC seems to contain a definition.
All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).

The intent of this text is to clarify the rule.
No text changed.

Comment	Response
SECT A SUB C - AMC MA.306	
Paragraph (a) section 2 sub para iii	
Cmt. 14 / British Airways	
Current aircraft log shows Block Time only. i.e. duration of flight. Actual take off and landing times are recorded elsewhere. Confirmation required that this process will remain acceptable provided agreed with the competent Authority (NAA)..	This was existing AMC OPS 1.915 text. No text changed.
Paragraph Section 2 note	
Cmt. 12 / BMV Austria	
Change the text in the Note as follows: "Note: If the maintenance is controlled by other means acceptable to the competent authority the details of when the next scheduled an out of phase maintenance is due should be accessible for the pilot ."	This was existing AMC OPS 1.915 text. No text changed.

Comment	Response
SECT A SUB D - AMC M.A.402	
Paragraph (b) 1	
Cmt. 20 / CAA Netherlands	
Typo: This para reveres to Sub-para 5, should be Sub-para 2.	Text changed
Paragraph (b)(1)	
Cmt. 29 / CA-UK	
This paragraph should reference Sub-paragraph (2) not (5).	Text changed.
Paragraph (c) para 1 and 4	
Cmt. 34 / ASA Sweden	
The fourth paragraph seems to contain a requirement. Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.4.	Text changed.
Paragraph 3	
Cmt. 2 / British Airways	
Does this only refer to Complex tasks indicated in M.A 801 para 2 and appendix 7 of part M. If not detailing all maintenance tasks on workcards will not be practical for the various types of A/C operated by the Airlines. The control and updating of Task Cards for older aircraft would be labour intensive. Non routine work, fault finding is not planned. Direct use of relevant manuals is required.	Complex maintenance as detailed in M.A.801 is not adressed in this paragraph. The rule has been amended to address the use of maintenance data directly. There is no need to address this in the AMC anymore. No text changed.
Paragraph Maintenance data 3	
Cmt. 21 / ERA	
This paragraph states that the maintenance data should be transcribed onto the work cards or work sheets. This would be a lengthy process for many tasks and, in some instances, would probably take longer to accomplish than the task itself. In general terms, would it not be acceptable to quote that the task had been accomplished in accordance with the chapter and verse reference numbers only?	The rule has been amended to address the use of maintenance data directly. There is no need to address this in the AMC anymore. No text changed.
Paragraph para 1 and 4	
Cmt. 34 / ASA Sweden	
The first paragraph seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).	This is not a definition. "made available" is a reference to the Part-M text that is further developed. No text changed.

Comment	Response
SECT A SUB D - AMC M.A. 403	
Paragraph (a)	
Cmt. 12 / BMV Austria	
Change text of third paragraph as follows: "Personnel not authorised to issue of a CRS should work under the supervision of certifying personnel. They may only perform maintenance that their supervisor...."	Text changed.
Cmt. 18 / DGAC, France	
Propose to delete paragraph. This AMC is raising more questions than helping to implement the rule: - It is adding on the requirement by putting additional responsibilities on the AMO and above all on the licensed engineer (what does it mean that he should ensure that personnel must have appropriate training/experience and at the same time to personally observe the work). - What is intended by appropriate training for limited pilot owner maintenance ? Is the pilot license and qualification sufficient or is there a need for additional training ? - Why is there a specific reference to UK guidance and FAA AC 43 ? Does this mean that all EU States have to follow either the UK guidance or FAA AC 43 ? If there is a need for guidance in this matter, there should be EASA guidance.	Text changed.
Cmt. 18 / DGAC, France	
Propose to delete paragraph. This is a new requirement compared to JAR145 which is not addressed in Part M. An inspector is not systematically a certifying personnel This will be difficult to implement for small organizations M.A. Subpart F approved It used to be a requirement in the French regulation for operators which has been cancelled by JAR OPS : it may be required for AOC holders operating large aircraft, but for every aircraft	Part-M has been amended to require duplicate inspections except in the Part-145 environment where other controls described in NPA 145-12 have been put in place. As outside the Part-145 environment there is no quality system, only independent inspections can ensure correct completion of flight safety sensitive tasks. The risk exposure in the non AOC environment is higher due to the absence of equivalent control mechanisms that are present in the AOC environment, therefore is deemed essential to flight safety to have another level of control.
Cmt. 21 / ERA	No text changed.
This paragraph sets out the need for independent inspection. However, when referring back to Part M, we can see no reference to the requirement within the concerned paragraph. Can the Agency please verify that this is in the correct area?	Part-M has been amended. No text changed.
Cmt. 22 / KLM	
Independent Inspection; This is a new item and it will take more time to analyze the content of this AMC and its implications on the organization than the comment period currently allows. There is just a faint connection to the rules in ECARM.402/403 and the extensive content of this AMC. It is also not clear if this is an Operator (subpart G) item, to be implemented in the maintenance program, an AMO ECAR-145 issue to be implemented only in the performance of maintenance, or a combination of both.	Part-M has been amended to require duplicate inspections except in the Part-145 environment where other controls described in NPA 145-12 have been put in place. As outside the Part-145 environment there is no quality system, only independent inspections can ensure correct completion of flight safety sensitive tasks. No text changed.

Comment	Response
Cmt. 31 / Martinair Holland NV	
<p>Independent Inspection: This is a new item and it will take more time to analyse the content of this AMC and its implications on the organisation than the comment period currently allows. This is an additional maintenance practice (equal to critical task requirement as laid down in AMC145.A.65(b)(3)) which should not be described here, but in Part 145 and if applicable to M.A. Subpart F organisations in the Subpart F. It takes time to implement such a new maintenance practice at all organisations performing maintenance. This time should be given to the organisations.</p>	<p>Part-M has been amended to require duplicate inspections except in the Part-145 environment where other controls described in NPA 145-12 have been put in place. As outside the Part-145 environment there is no quality system, only independent inspections can ensure correct completion of flight safety sensitive tasks.</p> <p>No text changed.</p>
Cmt. 32 / The Royal Aeronautical Society	
<p>Sub-paragraph 2 Add: "The same philosophy should be applied to 'vital points' as may be defined to include (but not confined to): Major safety attachments, hinges etc Replacement of filler caps, MCDs etc Areas which are not accessible once maintenance is complete"</p>	<p>The minimum requirements are detailed in AMC M.A.402(a) but this can be extended subject to need.</p> <p>No text changed.</p>
Cmt. 34 / ASA Sweden	
<p>AMC M.A.403 (a) consists of two AMCs with the same number but with different headings (while they are referring to different requirements): AMC M.A. 403 (a) Performance of maintenance and AMC M.A. 403 (a) Performance of maintenance – independent inspection. It is of great importance that every AMC has its own unique number. It must be independent of its heading, since it is necessary that the AMC can be referred to in a simple and structured way. The two AMCs in question must be found under one single paragraph, i.e. AMC M.A.403 (a), or the two AMCs must be redrafted and receive different numbers.</p>	<p>AMC combined and renumbered.</p> <p>Text changed.</p>
Cmt. 35 / Tyrolean Airways	
<p>In the 3rd para first sentence replace the words "certifying personnel" with "qualified personnel as described in the organisations MOE". Otherwise it would require (also for 145 organisations) that maintenance tasks are either performed or supervised by Certifying staff! Part 145 leaves the description of the qualification of mechanics who perform maintenance to the Part 145 organisation.</p>	<p>Text changed but not as requested.</p>
Paragraph (a) 3.2	
Cmt. 2 / British Airways	
<p>This subparagraph is not practical and lowers maintenance standards. How can a verification check on a critical aircraft system be carried out without issuing a CRS to indicate it has been done.</p>	<p>A CRS is not required after a verification check. This does not mean that the verification must not be signed off on a work card. There is a difference between signing off a task and signing a release to service. For example a D check may have several thousand tasks and inspections but only requires one CRS.</p>
Cmt. 2 / British Airways	
<p>This subparagraph is not practical and lowers maintenance standards. How can a verification check on a critical aircraft system be carried out without issuing a CRS to indicate it has been done.</p>	<p>A CRS is not required after a verification check. This does not mean that the verification must not be signed off on a work card. There is a difference between signing off a task and signing a release to service. For example a D check may have several thousand tasks and inspections but only requires one CRS.</p>
Cmt. 2 / British Airways	
<p>This subparagraph is not practical and lowers maintenance standards. How can a verification check on a critical aircraft system be carried out without issuing a CRS to indicate it has been done.</p>	<p>No text changed.</p>

Comment	Response
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Paragraph (a) 5th para

Cmt. 12 / *BMV Austria*

Delete "such as FAA Advisory Circular 43 or UK CAA Civil Aircraft Airworthiness Information and Procedures etc."

Text changed.

Paragraph (b) 3rd paragraph

Cmt. 29 / *CAA-UK*

Suggest removing the word "properly" as this is confusing.

Text changed.

Comment	Response
SECT A SUB D - AMC M.A.404	
Paragraph (b)	
Cmt. 18 / DGAC, France	
<p>The AMC should specify that in large organisations, the impact of the defect on flight safety may be determined by the technical department and not by the certifying staff who will only sign the technical log</p> <p>It should also clarify that the rule does not mean that maintenance personnel are not involved in the process, when obviously the intent is just to allow the pilot to take the decision alone in specific cases and not to avoid the input of the maintenance personnel</p>	<p>The rule details that only certifying staff can take the decision. This AMC does not prevent the analysis being carried out by the appropriate technical department whether or not in large organisations. However, the final decision, the release to service, must be taken by the certifying staff.</p> <p>No text changed.</p>

Comment	Response
SECT A SUB E - AMC M.A.501	
Paragraph [redacted]	
Cmt. 15 / Lufthansa Technik AG	
This § should be identical to 145.A.42 (a). This is supported by the fact, that this § will also be valid for Part-145 Maintenance Organisations.	The two texts have been harmonised. However the Part-M environment contains extra elements that are not recognised in the Part-145 environment as detailed in new paragraph (h). Text changed.
Cmt. 16 / Lufthansa Technik	
This § should be identical to 145.A.42 (a). This is supported by the fact, that this § will also be valid for Part-145 Maintenance Organisations.	The two texts have been harmonised. However the Part-M environment contains extra elements that are not recognised in the Part-145 environment as detailed in new paragraph (h). Text changed.
Paragraph (a) [redacted]	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. The documents approved for installation should be in the rule. JUSTIFICATION: See DGAC comments n°3 on article 3 of the maintenance regulation and n°15 on M.A.501(a)	Paragraph M.B.103 of the requirement states that when AMCs are complied with, the related requirements of the Part are met. If this AMC is complied with, then a component is fit for instalment. Article 13 and 14 of the Basic Regulation specify that AMCs shall be developed by Agency. An equivalent to an existing AMC constitutes a new AMC. It is therefore task of the Agency to develop and publish such equivalents. Text changed but not as requested.

Paragraph (a) 5

Cmt. 13 / Finnair

5. For the purpose of Part M, a document equivalent to an EASA Form 1 may be:

(a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Union;

(b) a JAA Form 1 issued prior to 27 March 2007 by a JAR 145 organisation approved by JAA Full Member Authority and within the JAA mutual recognition system;

(c) A release document issued by an organisation approved under the terms of a JAA maintenance bilateral agreement including JAA accepted FAA and TCA approved organisations;

(d) in the case of new aircraft components that were released from manufacturing prior to the IR-21 compliance date the component should be accompanied by a JAA Form One issued by a JAR 21 organisation approved by a JAA Full Member Authority and within the JAA mutual recognition system;

(e) a JAA Form 1 issued prior to 27 March 2007 by a maintenance organisation approved by a competent authority in accordance with its national regulations;

(f) a release document acceptable to a competent authority according to the provisions of a bilateral agreement between the competent authority and a third country until superseded by the corresponding agreement signed by the European Union. This provision is valid provided the above agreements between the competent authority and a third country are notified to the Commission and to the other competent authorities in accordance with Article 9 of EC Regulation 1592/2002.

Reason: 1) Definition of document equivalent to EASA Form 1 should be equal in Part 1 and Part M and include also JAA accepted FAA and TCA approved organisations.
2) To allow reasonable time to operators/maintenance organisation for changing their component maintenance arrangements and to EU to provide bilateral agreements.

Text changed but not as suggested.

Comment	Response
Cmt. 13 / Finnair	
<p>5. For the purpose of Part M, a document equivalent to an EASA Form 1 may be:</p> <p>(a) a release document issued by an organisation under the terms of a bilateral agreement signed by the European Union;</p> <p>(b) a JAA Form 1 issued prior to 27 March 2007 by a JAR 145 organisation approved by JAA Full Member Authority and within the JAA mutual recognition system;</p> <p>(c) A release document issued by an organisation approved under the terms of a JAA maintenance bilateral agreement including JAA accepted FAA and TCA approved organisations;</p> <p>(d) in the case of new aircraft components that were released from manufacturing prior to the IR-21 compliance date the component should be accompanied by a JAA Form One issued by a JAR 21 organisation approved by a JAA Full Member Authority and within the JAA mutual recognition system;</p> <p>(e) a JAA Form 1 issued prior to 27 March 2007 by a maintenance organisation approved by a competent authority in accordance with its national regulations;</p> <p>(f) a release document acceptable to a competent authority according to the provisions of a bilateral agreement between the competent authority and a third country until superseded by the corresponding agreement signed by the European Union. This provision is valid provided the above agreements between the competent authority and a third country are notified to the Commission and to the other competent authorities in accordance with Article 9 of EC Regulation 1592/2002.</p> <p>Reason: 1) Definition of document equivalent to EASA Form 1 should be equal in Part 1 and Part M and include also JAA accepted FAA and TCA approved organisations. 2) To allow reasonable time to operators/maintenance organisation for changing their component maintenance arrangements and to EU to provide bilateral agreements.</p>	<p>Text changed but not as suggested.</p>
Paragraph (a) 5 (b)	
Cmt. 21 / ERA	
<p>This paragraph mentions the date 27 March 2007. Can the Agency please explain the rationale behind choosing this date?</p>	<p>This paragraph has now been changed.</p>
Cmt. 29 / CAA-UK	
<p>This paragraph should be in two parts: - (b)(1) A JAA form 1 issued prior to 28/09/04 by JAR 145 organisation approved by an EU Member State and within the mutual recognition system. (b)(2) A JAA form 1 issued prior to 28/09/03 by a JAR 145 organisation approved by a JAA full Member Authority.</p>	<p>Text changed.</p>
Paragraph (a) 5 a	
Cmt. 25 / LBA, Germany	
<p>Add 'or by a Member State of the EU', because old bilateral agreements will still be in use which are signed by a Member State of the EU.</p>	<p>Text changed but not as requested.</p>

Comment	Response
Paragraph (a) 5 c	
Cmt. 25 / LBA, Germany	
Replace 'IR-21' with 'Part 21'. This is the old wording for 'Part 21'.	Text changed.
Paragraph (a) 5(d)	
Cmt. 29 / CAA-UK	
The reason for removal of this paragraph is because it is incorporated in AMC to 501 (a) 5(b)	Text changed but not as requested.
Paragraph (a) 6.	
Cmt. 29 / CAA-UK	
Replace the words "Competent Authority" with "Member State" for clarity.	Text changed.
Paragraph (b) item 3	
Cmt. 12 / BMV Austria	
In the second sentence change "manufacturer's" to "TC holder's"	Some components do not have TCs.
	Text changed but not as suggested.
Paragraph (d) para 1	
Cmt. 34 / ASA Sweden	
The indicated paragraphs seem to contain definitions. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).	This is qualification of rule material and is not considered as a definition.
	Text not changed.
Paragraph (d) para 2	
Cmt. 34 / ASA Sweden	
The indicated paragraphs seem to contain definitions. All definitions form part of the requirements and should be found in its respective Part of the requirements (i.e. Part M).	This is qualification of rule material and is not considered as a definition.
	Text not changed.

Comment	Response
SECT A SUB E - AMC M.A.504	
Paragraph (c)	
Cmt. 16 / Lufthansa Technik	
Comment: The intention of this § is clearly understood and supported but for component being classified as unsalvageable there may be a repair developed at a later time or a life limit extension may be granted by the TC-holder at a later time, so the possibility to segregate but not necessarily mutilate these parts must be found.	The rule in M.A.504(d)1 provides for storage. No text changed.
Cmt. 18 / DGAC, France	
See DGAC comment n° 16 on M.A.504(b) and ©	When a component is found unserviceable it is either sent back to the supplier or sent for repair. There is no need for the independent mechanic to keep such part. The issues raised are not linked to the subject under discussion. No text changed.
Paragraph (b)	
Cmt. 18 / DGAC, France	
See DGAC comment n° 16 on M.A.504(b) and ©	When a component is found unserviceable it is either sent back to the supplier or sent for repair. There is no need for the independent mechanic to keep such part. The issues raised are not linked to the subject under discussion. No text changed.
Paragraph (c) 1 (d)	
Cmt. 21 / ERA	
This paragraph classifies as unsalvageable a certified life-limited part that has "missing or incomplete records". It has been the case for many years that, in such a case where an overhaul life is specified, the component can be overhauled and allowed to re-enter service. How would the Agency respond to this?	In the case of life limited parts it is not possible to zero time the parts whether or not they have complete records. Overhaul only applies to service life limited components with an overhaul life limit. In the case of life limited parts, no overhaul can verify the total life remaining of the Part. No text changed.
Paragraph (d)	
Cmt. 21 / ERA	
In complying with this instruction to "mutilate" any components, the organisation would negate the last sentence of paragraph M.A.504 (c) that caters for life limit extensions or repair solutions being approved. Can this be removed?	The rule provides for storage or "Mutilation". No text changed.
Paragraph (e) para (a)	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a prohibition ("Ink stamping is not "). Delete the sentence "Ink stamping is not" and rephrase the paragraph in order to clarify what sort of stamping is acceptable.	Ink stamping is not considered to be an acceptable means of compliance. No text changed.

Comment

Response

Paragraph ©

Cmt. 15 / Lufthansa Technik AG

Comment: The intention of this § is clearly understood and supported but for component being classified as unsalvageable there may be a repair developed at a later time or a li limit extension may be granted by the TC-holder at a later time, so the possibility to segregate but not necessarily mutilate these parts must be found.

The rule in M.A.504(d)1 provides for storage.

No text changed.

Comment

Response

SECT A SUB F - AMC M.A.601

Paragraph

Cmt. 12 / *BMV Austria*

Add after "may": "also"

This AMC clarifies the rule therefore the word also is not deemed necessary.

No text changed.

Comment	Response
SECT A SUB F - AMC M.A.603	
Paragraph (a)	
Cmt. 25 / LBA, Germany	
New ATA specification 100 chapter 44 'cabin systems' is missing.	This is the existing JAR ATA reference that will have to be reviewed by EASA in the future. No text changed.
Paragraph (a) paragraph 1	
Cmt. 29 / CAA-UK	
Suggest changing the text in the third sentence to "Audits related to the "continuation" of the approval..... By replacing the word "renewal" with "continuation" because the approval is issued for an unlimited duration.	Text changed in AMC M.B.603(a)1.
Paragraph (b)	
Cmt. 18 / DGAC, France	
<p>§ 1. The agreement by the competent authority for the fabrication of parts by the approved maintenance organisation should be formalised through the approval of a detailed procedure in the maintenance organisation manual. This AMC contains principles and conditions to be taken into account for the preparation of an acceptable procedure for the fabrication of parts by the approved maintenance organisation."</p> <p>Most of this AMC should be included in the rule.</p> <p>JUSTIFICATION: The regulation does not require a specific approval of the fabrication procedure. This procedure is just one of the procedure included in the maintenance organisation manual which is globally approved under M.A.604(b) See DGAC comment n° 17 on M.A.603</p>	This is not a derogation from Part 21. Part 21 explicitly authorises the fabrication of parts in maintenance organisations. Furthermore, no EASA Form 1 is issued as such for internal use. Finally this was existing JAA TGL 9 text No text changed.
Paragraph (b) 3	
Cmt. 25 / LBA, Germany	
The wording should be equivalent to AMC 145.A.42(c) 6.	AMC 145.A.42(c) 6 is replicated in AMC M.A.603 (b)6. No text changed
Paragraph (b) para 4	
Cmt. 34 / ASA Sweden	
Para 4 of the AMC seems to contain requirements and prohibitions.	This text originates from TGL 9. It is not considered as a requirement. This is qualification of rule material. Text not changed except the word "prohibition" that has been removed.

Comment	Response
Paragraph (b) para 4, 5, 7, 8, and 9	
Cmt. 34 / ASA Sweden	
<p>Proposal: Delete the paragraphs containing requirements and insert the requirements in Part M or change the wording in each paragraph to clarify the non-mandatory status of the AMC. All definitions form part of the requirements and should be found in its respective Part of the requirements.</p>	<p>This text originates from TGL 9. It is not considered as a requirement. Text changed but not as requested.</p>
Paragraph (b) para 5	
Cmt. 34 / ASA Sweden	
Para 5 of the AMC seems to contain a prohibition.	<p>This text originates from TGL 9. It is not considered as a requirement. This is qualification of rule material. Text not changed.</p>
Paragraph (b) para 7	
Cmt. 34 / ASA Sweden	
<p>In para 7 of the AMC, the words "but are not limited to" should be deleted. The words may lead to misunderstandings regarding the status of the AMC, since acceptable means of compliance are designed to "illustrate a means but not the only means by which requirement contained in an implementing rule can be met" (with reference to para 9 of the explanatory memo of Consultation paper 3/2003-03-07). The note to para 7 seems to contain a prohibition.</p>	<p>This text originates from TGL 9. It is not considered as a requirement. Paragraph M.B.103 of the requirement states that when AMCs are complied with, the related requirements of the Part are met. If this AMC is complied with, then a component is fit for instalment. Article 13 and 14 of the Basic Regulation specify that AMCs shall be developed by the Agency. An equivalent to an existing AMC constitutes a new AMC. It is therefore the task of the Agency to develop and publish such equivalents. No text changed.</p>
Paragraph (b) para 8	
Cmt. 34 / ASA Sweden	
Para 8 of the AMC seems to contain a requirement.	<p>This text originates from TGL 9. It is not considered as a requirement. Text not changed.</p>
Paragraph (b) para 9	
Cmt. 34 / ASA Sweden	
Para 9 of the AMC seems to contain requirements ("must").	Text changed.
Paragraph (b) paragraph 7	
Cmt. 29 / CAA-UK	
<p>This paragraph is derived from TGL material and is similar to but not consistent with Part 145.42 (c). The following paragraph is missing and should be inserted after item (f) before the note: - "All the above fabricated parts, should be in accordance with data provided in overhaul or repair manuals, modification schemes and service bulletins, drawings or otherwise approved by the competent authority".</p>	Text harmonised, Part-145 changed.

Comment

Response

Paragraph *para 3 and 4*

Cmt. *34 / ASA Sweden*

The indicated paragraphs seem to contain requirements.
Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.
(It should be noted that the heading of the acceptable means of compliance under AMC M.A.606 (a) – (f) have a different heading than the requirements that they are referring to. All AMC and GM headings should be the same as those of the requirements that they are referring to.)

This text originates from TGL 9. It is not considered as a requirement.
Text not changed.

Comment	Response
SECT A SUB F - AMC M.A.604	
Paragraph (5)	
Cmt. 2 / British Airways	
(5) a reference to an approved list of certifying staff: Reason for change: Large operators employ several thousand certifying staff any list would constantly require amending and require constant revisions of the Maintenance Organisational Manual.	Subpart F is a requirement adapted to small organisations maintaining non commercial air transport aircraft. AMC M.A.604 and AMC M.A.616 specify that for large organisations (more than 10 maintenance staff) it is recommended to have a MOE and a Quality system in compliance with Part-145. If this option is chosen then such lists can be maintained on databases. No text changed.
Paragraph 1/2	
Cmt. 20 / CAA Netherlands	
CAA-NL requires to delete the reference to the Part 145 MOE for Part M-F organisation 10 persons. A Part F company is limited by definition in its scope so a Part 145 MOE is necessary, not even if the number of personal exceeds ten.	This is qualification of rule material. It is not considered as a requirement. This A provides a structure for an organisation exceeding a certain size and complexity. Text changed but not as requested.
Paragraph 5	
Cmt. 5 / Monarch Aircraft Engineering Ltd	
(5) a reference to an approved listing of certifying staff: Large organisations employ many certifying staff. Such lists are maintained on database The ability to refer to such a database and not have to keep a list in the MOE is practical	Subpart F is a requirement adapted to small organisations maintaining non commercial air transport aircraft. AMC M.A.604 and AMC M.A.616 specify that for large organisations (more than 10 maintenance staff) it is recommended to have a MOE and a Quality system in compliance with Part-145. If this option is chosen then such lists can be maintained on databases. No text changed.
Paragraph paragraph 1	
Cmt. 29 / CAA-UK	
It is suggested the text is changed to "Appendix 4 to this AMC provides an outline of the format of an acceptable maintenance organization manual for a small organization with less than 10 maintenance staff".	Text changed.

Comment	Response
SECT A SUB F - AMC M.A.605	
Paragraph (c)	
Cmt. 32 / <i>The Royal Aeronautical Society</i>	
<p>Add the following paragraph: "A shelf-life system should be included in stock records and identity tags used to identify such components, some of which may have a limited life"</p> <p>Sub-para 6 : The sentence, "Procedures should be defined by the organisation describing the decision process for the status of unserviceable components." should be replaced with "The organization should maintain a stores procedures manual defining the decision process for the status of unserviceable components."</p>	<p>- Text added to AMC M.A.605(c)3</p> <p>- A specific "stores procedures manual" would be too onerous for this sector of the market. No text changed</p>

Comment	Response
SECT A SUB F - AMC M.A.606	
Paragraph [redacted]	
Cmt. 2 / <i>British Airways</i>	
<p>d) The organisation must have appropriate staff for the normal expected contracted work. The use of temporarily sub-contracted staff is permitted in the case of higher than normally expected contracted work.</p> <p>This paragraph is too restrictive. Companies have found it makes increase business sense to meet changes in maintenance requirements by employing temporary staff. This includes employing staff that would be expected to issue a CRS. Provided proposed contracted staff are the subject of stringent background research and ensuring that they meet JAR 66 (ECAR 66) recency requirements. Contracted staff should only be used for certification privileges provided they meet the requirements to hold a company authorisation on the aircraft type for which certification is sought.</p>	<p>This is a comment on the rule not the AMC.</p> <p>In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff.</p> <p>No text changed.</p>
Cmt. 29 / <i>CAA-UK</i>	
The last sentence has duplicated the words "Competent Authority"	Text changed.
Paragraph (a)	
Cmt. 12 / <i>BMV Austria</i>	
Delete "competent authority" in the last sentence	Text changed.
Paragraph (c) (1)	
Cmt. 12 / <i>BMV Austria</i>	
The first sentence should read "... which are listed in paragraphs 2.1 to 2.5 below	Text changed.
Paragraph (c) 1	
Cmt. 20 / <i>CAA Netherlands</i>	
Typo: should be para 2.1 to 2.5 below.	Text changed.
Paragraph (d)	
Cmt. 34 / <i>ASA Sweden</i>	
<p>All paragraphs seem to contain requirements/definitions: Delete the paragraph containing requirements and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC. All definitions form part of the requirements and should be found in its respective Part of the requirements. (It should be noted that the heading of the acceptable means of compliance under AMC M.A.606 (a) – (f) have a different heading than the requirements that they are referring to. All AMC and GM headings should be the same as those of the requirements that they are referring to.)</p>	<p>This is qualification of rule material. It is not considered as a requirement.</p> <p>Text not changed.</p>

Comment	Response
Paragraph (d) para 3 Cmt. 18 / DGAC, France	<p>In the absence of a quality system requirement, the organisation cannot evaluate contracted staff as a Part-145 organisation would in order to determine the competence of the staff. Furthermore staff are not required to work on a full time basis. This is especially the case for voluntary work, frequent in the non commercial sector of the industry.</p> <p>No text changed.</p>
Paragraph (f) 2 Cmt. 25 / LBA, Germany Add 'or newest version'. The reference is made to 'European Standard 4179:2000 (EN 4179)'. It might be better to have a more flexible link to newest version of EN 4179, because it is AMC material and a not binding rule.	Text changed.
Paragraph (f) 4 Cmt. 20 / CAA Netherlands CAA-NL suggests the last sentence should go to section B, it is an obligation of the Authority	Text changed but not as requested.
Paragraph (f) para 1, 2 and 5 Cmt. 34 / ASA Sweden Para 1, 2 and 5 of the AMC seem to contain definitions. Proposal: Delete the paragraph containing requirements and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC. All definitions form part of the requirements and should be found in its respective Part of the requirements. (It should be noted that the heading of the acceptable means of compliance under AMC M.A.606 (a) – (f) have a different heading than the requirements that they are referring to. All AMC and GM headings should be the same as those of the requirements that they are referring to.)	<p>This is qualification of rule material. It is not considered as a definition.</p> <p>Text not changed.</p>

Comment	Response
Paragraph (f) para 3	
Cmt. 34 / ASA Sweden	
<p>Para 3 of the AMC seems to contain a prohibition.</p> <p>Proposal: Delete the paragraph containing requirements and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC. All definitions form part of the requirements and should be found in its respective Part of the requirements. (It should be noted that the heading of the acceptable means of compliance under AMC M.A.606 (a) – (f) have a different heading than the requirements that they are referring to. All AMC and GM headings should be the same as those of the requirements that they are referring to.)</p>	<p>This is qualification of rule material. It is not considered as a prohibition.</p> <p>Text not changed.</p>
Paragraph (f) paragraph 1	
Cmt. 12 / BMV Austria	
<p>Change the text after "...type certificate holder /aircraft, engine or propeller in the..</p>	<p>Text changed.</p>

Comment	Response
SECT A SUB F - AMC M.A.607	
Paragraph <i>para 1</i>	
Cmt. <i>34 / ASA Sweden</i>	
<p>Para 1 of the AMC seems to contain a definition.</p> <p>Delete the paragraph containing requirements and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.</p> <p>All definitions form part of the requirements and should be found in its respective Part of the requirements.</p>	<p>This is qualification of rule material. It is not considered as a definition.</p> <p>Text not changed.</p>
Paragraph <i>para 2</i>	
Cmt. <i>34 / ASA Sweden</i>	
<p>Para 2 of the AMC seems to contain a requirement.</p> <p>Delete the paragraph containing requirements and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.</p> <p>All definitions form part of the requirements and should be found in its respective Part of the requirements.</p>	<p>This is qualification of rule material. It is not considered as a requirement.</p> <p>Text not changed.</p>

Comment	Response
SECT A SUB F - AMC M.A.609	
Paragraph	
Cmt. 18 / DGAC, France	
<p>"When an organisation uses customer provided maintenance data, the scope of approval work indicated in the maintenance organisation manual should be limited to the individual aircraft covered by the contracts signed with those customers unless the organisation holds its own complete set of maintenance data for that type of aircraft."</p> <p>JUSTIFICATION: Clarification (If the intent is not to include that limitation in the scope of work but in the extent of approval indicated on the approval certificate, this should be specified and the AMC should be transferred in section B).</p>	Text changed.
Cmt. 20 / CAA Netherlands	
CAA-NL suggests this should go to section B, it is an obligation of the Authority.	Text changed but not as proposed.

Comment	Response
SECT A SUB F - AMC M.A.613	
Paragraph (a) 2.3	
Cmt. 25 / LBA, Germany	
According to the text in 2.3 also an organisation with an approval class rating for the product in which it may be installed can issue a EASA Form One. This option should be clearly limited to the case of serviceable removed aircraft components or recertification of stock material. For all other RTS on a EASA Form One a respective B- or C-Rating should be clear required.	Existing text transferred from JAA TGL 10. No text changed.
Paragraph (a) para2	
Cmt. 34 / ASA Sweden	
Is this a heading? If not, the sentence should be completed. If it is a heading, it does not need a paragraph number. At present, it is confusing.	Text changed.
Paragraph (a) paragraph 2.2	
Cmt. 29 / CAA-UK	
The first sentence should refer to a subpart F maintenance organization and the word "exposition" should be replaced by the word "manual"	Text changed.

Comment	Response
SECT A SUB F - AMC M.A.614	
Paragraph [redacted]	
Cmt. 2 / <i>British Airways</i>	
Current NAA approved methods of Controlling/Maintaining airworthiness compliance records and their back ups should remain acceptable. Companies would have to incur excessive costs if their agreed procedures were changed.	This is a requirement for Subpart F organisations that do not apply to commercial transport. Furthermore, it is a transfer from AMC 145.55 which reflect current industry standards. No text changed.
Paragraph (a) 2	
Cmt. 25 / <i>LBA, Germany</i>	
To trace the total time in service of any aircraft part and component is the general responsibility of the G1 – Maintenance Management Organisation. Please move this part the AMC to the respective part in "G". Sollte an dieser Stelle auch erwähnt werden, da diese Flugzeuge sehr selten in einer G1 Organisation auftauchen werden.	Text has been removed and put in subpart C AMC M.A.305(h). Text changed.
Paragraph (a) 3	
Cmt. 25 / <i>LBA, Germany</i>	
The main concern while reconstruction of records is to prove the maintenance status of component (AD-Status and life time). It is the usual task of a G1-Organisation to deal with these subjects. It should be a privilege of a G1-Organisation to carry out this task, if necessary with help of a F-Organisation. Please move this part of the AMC into the respective part in "G".	Text has been removed and put in subpart C AMC M.A.305(h). Text changed.

Comment	Response
SECT A SUB F - AMC M.A.616	
Paragraph 3	
Cmt. 20 / CAA Netherlands	
CAA-NL requires to delete the reference to the Part 145 audits for Part M-F organisati > 10 persons. A Part F company is limited by definition in its scope so a Part 145 audit system is not necessary, not even if the number of personal exceeds ten.	This is qualification of rule material. It is not considered as a requirement. This A provides a structure for an organisation exceeding a certain size and complexity. Text changed but not as requested.

Comment	Response
SECT A SUB F - AMC M.A.617	
Paragraph (b)	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. JUSTIFICATION: The rule is self explanatory. See also DGAC comment n° 23 on M.A.618	This is original JAR 145 text. No change.
Cmt. 29 / CAA-UK	
The Rule M.A. 617 does not have a paragraph (b). It is recommended that a new sentence is added to the AMC stating "The approved maintenance organization should notify the competent authority of any of the listed changes at least 14 days before the changes take effect.	(b) removed. Adequate notification added. Text changed but not as requested.
Cmt. 34 / ASA Sweden	
The AMC refers to a requirement with the heading M.A.617, which consists of two paragraphs without numbers or letters. The heading of the AMC should be equivalent to the heading the requirement, i.e. AMC M.A.617. Delete the (a) in the paragraph number of the heading of the AMC.	Text changed.

Comment	Response
SECT A SUB G - AMC M.A.704	
Paragraph	
Cmt. 25 / LBA, Germany	
<p>For the item 2. and 3. it should be identified that the mentioned parts are the minimum content of the exposition that need to be addressed. The identification of dedicated part numbers to the topics should be deleted. Reasons :</p> <p>a) The given structure is not covering all possible combinations of approvals that could held by an organisation (i.e. AOC, JAR 21). b) Organisation may need or want to comply with other regulations that will require other subjects to be included into the exposition. If the given structure is too rigid for such variations to the handbook other means will be established. These additional means will as know from human factors - impact the compliance with the exposition and may so impair aircraft safety. Proposal: a) List the topics under item 2. as the minimum subjects to be addressed in the continuing airworthiness management exposition without specifying dedicated parts for the topics. b) Under item 3. a general statement allows the combination of the continuing airworthiness management exposition with other required expositions/manuals and refer to the appendix 5 for examples. c) Transfer the exposition content with dedicated parts identification (items 2. and 3.) as examples to appendix 5.</p>	<p>This is existing AMC OPS 1.905(a) text. No text changed.</p>
Cmt. 31 / Martinair Holland NV	
<p>Organisations should be given time to amend the MME or MOE (if the MME is incorporated in it) to meet the requirement of this Appendix 5 to AMC M.A.704. For example Appendix 5 to AMC M.A.704 requires a section 3.2 to describe the Quality Auditing of Aircraft which was not included in the Appendices to AMC OPS 1.905. Also the items on Airworthiness Review are new and should be described and formalised which takes time.</p>	<p>The transition for the commercial aviation issues provided by the regulation is two years for commercial air transport excluding A.R.C issues and 5 years for other issues. This provides sufficient time to amend the M.M.E. No text changed.</p>
Paragraph 6	
Cmt. 25 / LBA, Germany	
<p>Replace 'agreed' with 'approved'. The person responsible for the management of the quality system or for the organizational review should be approved by the competent authority.</p>	<p>The intent of comment is already covered by the term "approving competent authority". No text changed.</p>
Paragraph Appendix 5	
Cmt. 33 / CAA Belgium	
<p>Appendix 5 to AMC M.A. 704 Continuing airworthiness Management Exposition</p> <p>0.2 General information d) Type of operations (This paragraph should give broad information on the type of operations, [...], the main operating base, etc) Reason : JAA leaflet 19 example 2b e) Line stations locations Reason: JAA leaflet 19 Example 1A</p>	<p>Main operating base is not in leaflet 19. Line stations have not been included as it is part of the Part-145 exposition that may be combined with the continuing airworthiness management exposition. No text changed.</p>

Comment	Response
Paragraph <i>para 10</i>	
Cmt. <i>34 / ASA Sweden</i>	
Paragraph 10 seems to contain requirements in its first and second paragraphs. Delete paragraphs and insert the requirements in Part M or change the wording to clarify the nonmandatory status of the AMC.	This is qualification of rule material. It is not considered as a requirement. Text not changed.
Paragraph <i>para 4</i>	
Cmt. <i>34 / ASA Sweden</i>	
Delete the words "are expected to" in paragraph 4 and insert the word "should" instead	Text changed.
Paragraph <i>paragraph 3</i>	
Cmt. <i>12 / BMV Austria</i>	
The text should read: "... in a combined document. Follows the example for a combined Part-145 and ..."	Text changed.
Paragraph <i>paragraph 8</i>	
Cmt. <i>12 / BMV Austria</i>	
In the second line replace "subpart G1" by "M.A. Subpart G".	Text changed.

Comment

Response

SECT A SUB G - AMC M.A.705

Paragraph

Cmt. 12 / BMV Austria

In the third line replace "Subpart G1" by "M.A. Subpart G".

Text changed.

Comment	Response
SECT A SUB G - AMC M.A.706	
Paragraph (4.7)	
Cmt. 22 / KLM	
Suggest to omit: gained through a formalized training course, this to prevent managers go through formalized training courses every time a new fleet type aircraft is introduced	Text changed.
Paragraph (e) paragraph 2	
Cmt. 12 / BMV Austria	
The text should read: "This paragraph also applies to contracted maintenance...."	This is existing IEM OPS 1.895(c) text. No text changed.
Paragraph 4	
Cmt. 21 / ERA	
It is our opinion that this entire paragraph is too prescriptive. Many organisations that have been carrying out such duties for many years would have difficulty in meeting the requirements defined in this paragraph. Furthermore, in some EU Member States such as Portugal, an Aeronautical Degree has not been available until very recently. How would the Agency respond to this?	This AMC does not require an Aeronautical Degree. No text changed.
Paragraph paragraph 4.1	
Cmt. 29 / CAA-UK	
Add the words "including human factors" at the end of the sentence. This is to ensure nominated persons have knowledge and practical experience in human factors principal	This is covered by aviation safety standards. No text changed.

Comment	Response
SECT A SUB G - AMC M.A.707	
Paragraph	
Cmt. 2 / British Airways	
<p>(b)To be approved to carry out airworthiness reviews, an approved continuing airworthiness management organisation shall have appropriate airworthiness review staff to issue M.A. Subpart I airworthiness review certificates or recommendations. In addition to M.A 706(h) requirements this staff shall have acquired:</p> <ol style="list-style-type: none"> 1 -at least 5 years experience in continuing airworthiness, and; 2 - an Part-66 Cat B or Cat C licence, or a current NAA issued licence valid in at least categories or an aeronautical degree or equivalent, and; 3 -formal aeronautical maintenance training, and; 4 -a position within the approved organisation with appropriate responsibilities 5 -In cases of non compliance with any of the provisions of 1) to 4). The applicant shall satisfy the NAA that the nominated persons provide an equivalent level of confidence <p>Some organisations would have to make significant structural changes or move responsibilities to accommodate the requirements. This could also lead to unnecessary Industrial Relation issues within the companies affected.</p> <p>Staff that carry out the Airworthiness Review should not be required to be ECAR-66 license holders. Today they are appropriately qualified staff acceptable to the member state authority supported by certifying staff if required, during the physical aircraft survey. The task requires a different population with a different education to that of the Part-66 staff JAR-66/Part-66 is not as yet mandatory in most countries and some JAR-145 organisations still hold "grandfather rights" for Certifying staff that do not hold JAR-66 licenses. The cut off date is 2011 for conversion of old licenses to JAR-66. There might be experienced staffs that are going to retire before 2011 and they might not need to convert. A license issued by a JAA/EU member state should suffice.</p> <p>With reference to M.A.707 (a) 3 – Formal aeronautical maintenance training. What further training would someone who has 5 years experience and holds a maintenance engineers license need to undergo? It seems that this training is not yet defined.</p> <p>Although ECAR-M states that Airworthiness Review staff have to be Part-66 licensed, it fails to set the category A, B or C and doesn't refer to type related experience or qualification.</p> <p>Why is an aeronautical degree acceptable as an alternate to an Part-66 license? The degree is not experience based.</p>	<p>This is a comment to the rule. The answers given were:</p> <p>"Part 66 is not mandatory as a minimum requirement for airworthiness review staff. An equivalent of an aeronautical degree is possible and these are the requirements recommended by ICAO."</p> <p>Furthermore, there is a transition for ARC issues of 5 years and a transition for licensing issues for a maximum of 3 years. Conversions from national licences will have taken place before the start of ARC procedures.</p> <p>No text changed.</p>
Paragraph (a)	
Cmt. 31 / Martinair Holland NV	
<p>M.A. 707 - AMC M.A.707(a) - AMC M.A.710(b) and (c)</p> <p>Part 66 licenses should not be used for persons not working in a maintenance environment. Airworthiness Review staff of an operator not being certified according Part 145 can not hold a Part 66 license but should be able to perform a Airworthiness Review in which the physical review is performed by the contracted Part 145 organisations certifying staff. We recommend to delete all references to Part 66 licenses for Airworthiness Review staff and demand that Airworthiness Reviews can only be performed by persons being part of the M.A. subpart G organisation and are mentioned in the CAME.</p> <p>The required adequate technical knowledge of Airworthiness Review staff could be specified using the training levels mentioned in Part 66.</p> <p>This way persons not holding a Part 66 license but having the same level of knowledge (i.e. because the person held a Part 66 or equivalent license in the past) can be granted the possibility to perform Airworthiness Reviews.</p> <p>Performing Airworthiness Reviews should be a complete independent discipline from performing Maintenance.</p>	<p>This is a comment to the rule. The answers given were:</p> <p>"Part 66 is not mandatory as a minimum requirement for airworthiness review staff. An equivalent of an aeronautical degree is possible and these are the requirements recommended by ICAO."</p> <p>No text changed.</p>

Comment

Response

Paragraph (a) (3)

Cmt. 12 / *BMV Austria*

In AMC M.A. 707(a)(3) the text should read:
"An appropriate Part 66 qualification is a category B or C licence....or for aircraft other than aeroplanes and helicopters a qualification according to Part 66 Subpart B"

Balloons and gliders are dealt with by "equivalent qualification" in the rule.
Text changed but not as proposed.

Comment	Response
SECT A SUB G - AMC M.A.708	
Paragraph (c)	
Cmt. 25 / LBA, Germany	
Delete items 5. and 6. as this type of arrangement can neither be adequately monitored and controlled by the owner/operator nor adequately being surveyed by the competent authority without major workload as the aircraft could no longer be considered in a controlled environment for the review of the airworthiness certificate. Clearly limit item 7.; part Airplane, engine maintenance to short term lease arrangements. The limit should be 6 months. Reason as above.	This arrangement was introduced by amendment 2 to JAR-OPS in 2000. This paragraph, AMC associated with the relevant rule material translates this amendment. There is no time limit in JAR-OPS. No text changed.
Cmt. 25 / LBA, Germany	
In item No. 4 the use of the IATA Standard Ground Handling Agreement should be limited to those maintenance events that are typically performed at line maintenance stations. Reason : The structure of the IATA Standard Ground Handling Agreement is not capable of accommodating the complex rights and obligations that are involved in Base Maintenance Even for Checks like A-Check or equivalent and higher the IATA Standard Ground Hand Agreement may not be useful if more than one event to be contracted as phased maintenance programmes will require different activities on the same check-level on a regular basis.	Text changed.
Cmt. 25 / LBA, Germany	
Additional guidance for the content of the maintenance contracts should be given. The content should be orientated on the Sections 7 to 9 of the former JAA Temporary Guidance leaflet No. 15. The information could be given as an appendix. In this case only a reference needs to be added (preferably to item 1.). Reason: Such guideline will facilitate the approval of maintenance contracts by the competent authority as required by M.A. 708 (c).	Appendix 10 added. Text changed.

Comment	Response
SECT A SUB G - AMC M.A.710	
Paragraph [redacted]	
Cmt. 2 / <i>British Airways</i>	
The aircraft survey requirements of a complete configuration check against approved documentation. Will this require every seat position to be checked for a life jacket? every seat belt need to be checked for security and operation? Better definition required. This proposal might be satisfactory for general aviation but is not practical for an operator of large commercial aircraft. A sample check process should be agreed taking into account the operators AMP requirements Clarification required.	New paragraph 4 to M.A. 710 (b) and (c) added to address sample test. Text changed.
Paragraph (a)	
Cmt. 29 / <i>CAA-UK</i>	
Change text to read – “list of deferred defects”, removed the word “differed	Text changed.
Paragraph (a) 1	
Cmt. 14 / <i>British Airways</i>	
When the airworthiness review is carried out is it the intention to review All EASA Form issued since the last review? The a large number of Form 1’s will be generated between reviews especially if the aircraft remains in a controlled environment. The same problem arises for all work packs and service life limited components. A sample size should be agreed between the competent authority and the airworthiness review organization. Should this sample highlight a problem then further investigation would be required.	Paragraph 1 to M.A. 710 (a) (1) has been modified. Text changed.
Cmt. 35 / <i>Tyrolean Airways</i>	
It should be clarified if during a “full documented review” all documents/ records of M.A.306/307 have to be checked or if checking of a representative amount of samples acceptable?	Paragraph 1 to M.A. 710 (a) (1) has been modified. Text changed.
Paragraph (a)(1)	
Cmt. 22 / <i>KLM</i>	
Should read: - List of deferred defects in relation to minimum equipment list - a full review of all relevant EASA form 1 or equivalent is a very heavy burden, when applied to commercial Operators of larger aircraft, given the large quantities of components that have been changed in any 3 year period. What is the aim of such detailed review?	- Text already deals with this issue, No text changed. - Paragraph 1 to M.A. 710 (a) (1) has been modified. Text changed.

Comment	Response
Paragraph (b)	
Cmt. 2 / British Airways	
<p>The approved continuing airworthiness management organisation airworthiness review staff, shall carry out a physical survey of the aircraft. For this survey, airworthiness review staff should comply with the requirements of ECAR-M 1.707 para (a) 1 to 5 (To be read in conjunction with changes to M.A.707 submitted by British Airways)</p>	<p>AMC M.A.710 (b) and (c) 2 deleted. This paragraph does not deal with the same subject as AMC M.A.707</p>
<p>Some organisations would have to make significant structural changes or move responsibilities to accommodate the requirements. This could also lead to unnecessary Industrial Relation issues within the companies affected.</p>	<p>Text changed.</p>
<p>Staff approved to carry out the Airworthiness Review are currently appropriately qualified and trained to standard acceptable to the member state NAA to carry out the physical aircraft survey.</p>	
<p>JAR-66/Part.66 is not as yet mandatory in most countries and some JAR-145 organisations still hold "grandfather rights" for Certifying staff that do not hold JAR-66 licenses. The cutoff date is 2011 for conversion of old license to JAR-66. There might be experienced staff that are going to retire before 2011 and they would not need to convert.</p>	
<p>Although ECAR-M states that Airworthiness Review staff have to be Part 66 licensed, it does not set the category A, B or C and doesn't refer to type related experience / qualified.</p>	
Paragraph (b) ©	
Cmt. 18 / DGAC, France	
<p>-The reference to both operations qualified as maintenance which may be necessary during airworthiness review and to Part 66 staff is confusing. It should be clarified that the role of the M.A.710 (b) 66 staff is not issue a CRS but to bring technical expertise and knowledge and that usually the airworthiness review will be carried out during a maintenance check and that the AMO personnel will normally carry out the required operations and issue the appropriate CRS.</p>	<p>AMC M.A.710 (b) and (c) 2 deleted. This paragraph does not deal with the same subject as AMC M.A.707</p>
<p>-The AMC should specify whether Part 66 staff may be contracted temporarily for the review and whether they can be contracted from the maintenance organisation.</p>	<p>Text changed.</p>
Cmt. 18 / DGAC, France	
<p>Delete §3. JUSTIFICATION: The rule do not require any flight test in order to complete the Airworthiness review. Therefore, no reference to "flight test" should be made.</p>	<p>This is only a possibility given.</p>
Cmt. 29 / CAA-UK	
<p>Add the following an additional item – (5) "A physical survey should always be performed at an approved maintenance facility coincident with an annual or similar check". This is to ensure the subpart G organization surveys the aircraft during a maintenance check and that the aircraft visits an approved facility at regular intervals. According to the current AMC it is possible for for a small aircraft to be maintained indefinitely by a licensed engineer on a farm strip.</p>	<p>The airworthiness review is not related to maintenance checks. Therefore it would not be appropriate to carry out the review in a maintenance organisation.</p>
Cmt. 29 / CAA-UK	
<p>Add the following an additional item – (5) "A physical survey should always be performed at an approved maintenance facility coincident with an annual or similar check". This is to ensure the subpart G organization surveys the aircraft during a maintenance check and that the aircraft visits an approved facility at regular intervals. According to the current AMC it is possible for for a small aircraft to be maintained indefinitely by a licensed engineer on a farm strip.</p>	<p>The airworthiness review is not related to maintenance checks. Therefore it would not be appropriate to carry out the review in a maintenance organisation.</p>
	<p>No text changed.</p>

Comment	Response
Paragraph (b) 1	
Cmt. 15 / Lufthansa Technik AG	
"... a release to service should be issued in accordance with Part-M or Part 145." Part-145 must be added.	Part-M calls for Part-145 release to service. No text changed.
Cmt. 16 / Lufthansa Technik	
"... a release to service should be issued in accordance with Part-M or Part 145." Part-145 must be added.	Part-M calls for Part-145 release to service. No text changed.
Paragraph (b) and (c)	
Cmt. 31 / Martinair Holland NV	
M.A.707 - AMC M.A.707(a) - AMC M.A.710(b) and (c) Part 66 licenses should not be used for persons not working in a maintenance environment. Airworthiness Review staff of an operator not being certified according Part 145 can not hold a Part 66 license but should be able to perform a Airworthiness Review in which the physical review is performed by the contracted Part 145 organisations certifying staff. We recommend to delete all references to Part 66 licenses for Airworthiness Review staff and demand that Airworthiness Reviews can only be performed by persons being part of the M.A. subpart G organisation and are mentioned in the CAME. The required adequate technical knowledge of Airworthiness Review staff could be specified using the training levels mentioned in Part 66. This way persons not holding a Part 66 license but having the same level of knowledge (i.e. because the person held a Part 66 or equivalent license in the past) can be granted the possibility to perform Airworthiness Reviews. Performing Airworthiness Reviews should be a complete independent discipline form performing Maintenance.	This is a comment to the rule. The answers given were: "Part 66 is not mandatory as a minimum requirement for airworthiness review staff. An equivalent of an aeronautical degree is possible and these are the requirements recommended by ICAO." No text changed.
Paragraph (b) and ©	
Cmt. 29 / CAA-UK	
Amend item 3. as follows:- "The physical survey may include verifications to be carried in flight". The reason for the text change is the use of the phrase "during a flight" constrains the verification to a single flight. If the verification requires more than one aircraft configuration (e.g. weight, c of g), it may be impossible to complete the verification during one flight.	Text changed.
Paragraph (c) 3	
Cmt. 5 / Monarch Aircraft Engineering Ltd	
The aircraft survey requirements of a complete configuration check against approved documentation need to be better defined. This might be suitable for small aircraft in non commercial aviation but is not practical for large commercial aircraft which need to take into consideration the maintenance programme requirements. Clarification required.	Surveys are type specific. The rule gives the basic requirements that the M.A.Subpart G organisation must ensure are complied with for each type. No text changed.

Comment	Response
Paragraph (e)	
Cmt. 35 / Tyrolean Airways	
To minimise bureaucracy and administration only the airworthiness review certificate should be sent to the authority. If required both compliance reports can be checked during the regular authority audits at the organisation. Past experience in some member states support this solution as good working.	In the case of the non controlled environment, when a recommendation is sent, it is not possible for the competent authority to properly analyse the recommendation without having the appropriate information available. On the other hand, in the case of the controlled environment, only a copy of the AMC must be sent.
Paragraph (e) & (f)	
Cmt. 25 / LBA, Germany	
A time limit for the submission of the review documents should be added, especially for the case of recommendation in order that the competent authority has sufficient time for review and actions if necessary. A period of 10 days after the end of the review is deemed appropriate.	The review may be anticipated by 90 days, M.A.710(d). No text changed.
Paragraph para 1	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a requirement ("is at least"). Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.	This is qualification of rule material. It is not considered as a requirement. Text not changed.

Comment	Response
SECT A SUB G - AMC M.A.711	
Paragraph (b)	
Cmt. 18 / DGAC, France	
<p>"It is not necessary for a continuing airworthiness management organisation to be approved to carry out airworthiness reviews. This can be contracted to another appropriately approved organisation. In this case, the airworthiness review should be carried out every year and the ARC issued by the competent authority of registry following a recommendation."</p> <p>4.JUSTIFICATION: Clarification See DGAC comment n°33 on M.A.902</p>	Text changed.

Comment	Response
SECT A SUB G - AMC M.A.712	
Paragraph (c)	
Cmt. 25 / LBA, Germany	
For commercial operation guidance for the auditing and monitoring of the contacted maintenance should be specified. The guidelines should follows the technical aspects of AMC JAR OPS 1./3.035 Item 4. Reason : Prevent a discontinuity in the auditing function of an operator.	Only the maintenance specific elements have been addressed. JAR-OPS 1.035 d with all the activities. Furthermore, M.A.712 (e) imposes the operators quality system which is already in JAR-OPS. No text changed.
Paragraph (a) 5	
Cmt. 31 / Martinair Holland NV	
JAR-OPS and Part 145 allow escalations of the yearly audit interval, this provision should also be present in the AMC M.A.712 (a)5. We advise to ad provisions as they defined in AMC 145.A.65(c)(1) item 7/8/9 into AM M.A.712.	Item 7 is included through organisational reviews that must be carried out every year. Item 8 is not applicable to management organisations. No text changed. For item 9, Paragraph 5 to M.A. 710 (a) (1) has been modified. Text changed.
Paragraph (b) paragraph 5	
Cmt. 29 / CAA-UK	
Replace the word "year" with annually for clarity	Text changed.
Paragraph (b) (5)	
Cmt. 22 / KLM	
AMC JAR-OPS 1 item 1.035-point 4.7.2 allows for escalation of the yearly audit check interval, this possibility is missing from M.A.712 (b) point 5. It is unacceptable that this procedure is lost in the transition to ECAR-M.	Text changed.
Paragraph (f)	
Cmt. 20 / CAA Netherlands	
The number of aircraft as such is no measure for a organisation being big or small. 11 or even 13 privately owned Cessna 172's under contract with a appropriate computer programme is still manageable by a small organisation (e.g. 1 man). The possible problems lie more in the process getting complex by all different kind of aircraft. CAA-N suggests to replace the numbers with a limit in different Manufacturers or groups of aircraft as defined in Part 66 for the B1 licence.	This is taken into account by the second sentence of AMC M.A.712(f). No text changed.
Cmt. 29 / CAA_UK	
This paragraph is not practical and needs rewriting to clearly state when a quality system is required	Text changed.

Comment	Response
SECT A SUB G - AMC M.A.713	
Paragraph [redacted]	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. JUSTIFICATION: The rule is self explanatory. See also DGAC comment n° 31 on M.A.715	This is original JAA text. No change.
Cmt. 25 / LBA, Germany	
Minimum time frames for the notification should be identified. The frames should be compatible with the still existing JAR OPS requirements.	Jar-ops only puts time constraints on the Operations manual. There is therefore no difference with JAR-OPS. No text changed.

Comment	Response
SECT A SUB G - AMC M.A.714	
Paragraph 5	
Cmt. 21 / ERA	
<p>This paragraph states that the computer back-up system should be updated at least within 24 hours of any maintenance. This paragraph is unclear. The phrase "at least" would imply that it can be in excess of 24 hours. However, it is our opinion that what is meant by this paragraph is that the computer back-up system should be updated within 24 hours of any maintenance. If this is the intent of this paragraph, this would be far too restrictive. It is impractical to require that all computer based records are updated within 24 hours of a major input. The sheer volume of data entry to be completed for such a check would make this impossible. Could the agency please clarify the meaning of this paragraph, taking into consideration the earlier comments?</p>	Text changed
Paragraph para 3	
Cmt. 34 / ASA Sweden	
<p>The AMC seems to contain a requirement. Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.</p>	<p>This is qualification of rule material. It is not considered as a requirement. No text changed.</p>
Paragraph paragraph 2	
Cmt. 29 / CAA-UK	
<p>The word "organization" seems to be incorrect and should be changed to "operator" to reflect the intent of AMC to JAR OPS 1.920</p>	<p>This includes JAR OPS 1.920 but has been extended to the non commercial case. No text changed.</p>

Comment	Response
SECT A SUB H - AMC M.A.801	
Paragraph (b) 2.	
Cmt. 29 / CAA-UK	
It is possible for individual licensed engineers to issue a certificate of release to service limited welding tasks not listed in appendix 7 of the rule. Therefore it is recommended that an AMC is written stating "Personnel who carry out specialized tasks such as welding shall be qualified in accordance with an officially recognized standard".	AMC M.A.402 (a) has been modified to add the comment. Text changed.
Paragraph (d) 4	
Cmt. 21 / ERA	
Can the Agency please explain what is meant by the phrase "dimensional information" in the last sentence?	This is existing AMC 145.50 (d) text. No text changed.
Paragraph (f)	
Cmt. 34 / ASA Sweden	
The AMC seems to contain a definition. All definitions form part of the requirements and should be found in its respective Part of the requirements.	This is qualification of rule material. This original JAA AMC 145.50 (a) text. No text changed.

Comment

Response

SECT A SUB H - AMC M.A.802

Paragraph

Cmt. 25 / LBA, Germany

Information on the minimum documentation required in this case should be given (i.e. limits, documentation used for maintenance etc.).

Text changed.

Comment	Response
SECT A SUB H - AMC M.A.803	
Paragraph	
Cmt. 18 / DGAC, France	
<p>1.The pilot-owner should hold a valid pilot license issued or validated by a member state with appropriate qualifications on the aircraft type being maintained.</p> <p>2.Privately operated means the aircraft is not operated pursuant to M.A.201 (h) and (i).</p> <p>3.A pilot owner should only issue a certificate of release to service for maintenance performed by the pilot owner and after demonstrating the competence to carry out such maintenance tasks.</p> <p>JUSTIFICATION:</p> <p>-The licence is not sufficient, the pilot must also be qualified on the aircraft type/class</p> <p>-The rule does not require demonstration of competence Pilot qualification, which includes aircraft general knowledge (including airworthiness) and common sense should be considered sufficient for these very limited tasks. We do not need to over-regulate and add superfluous administrative procedures.</p>	<p>'Qualification' for the aircraft is dealt with in paragraph 1 and 'competence' is dealt with in paragraph 3.</p> <p>Text changed but not as requested.</p>

Comment	Response
SECT A SUB I - AMC M.A.902	
Paragraph [redacted]	
<p>Cmt. 5 / Monarch Aircraft Engineering Ltd</p> <p>(a)An Airworthiness Review Certificate is issued in accordance with appendix 3 after a satisfactory airworthiness review and is valid for three years providing the aircraft is maintained within a controlled environment.</p> <p>(b) An aircraft in a controlled environment is an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations. This includes M.A .803(b) maintenance carried out and released to service according to M.A.801 (b)2 and M.A.801 (b)3.</p> <p>(c)If an aircraft is within a controlled environment, the continuing airworthiness management organisation managing the aircraft may if appropriately approved:</p> <p>1 -Issue the airworthiness review certificate in accordance with M.A.710; .</p> <p>2 -For airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, the airworthiness management organisation managing the aircraft shall terminate the airworthiness review certificate if it is aware or has reason to believe that the aircraft is unairworthy</p> <p>As an ECAR M operator the aircraft can only be maintained by an ECAR 145 or ECAR 147 accepted maintenance organisation and will therefore always be in a controlled environment. If the organisation responsible for the maintenance management changes, the aircraft would not be in a controlled environment and sub par (d) would apply.</p>	<p>Comment already answered in the rule.</p> <p>Experience shows that the controlled environment is not always maintained during three years. The extendable ARC caters for this case.</p> <p>No text changed.</p>
Paragraph (c)	
<p>Cmt. 25 / LBA, Germany</p> <p>Additional text should be added that ensures that the review certificates are submitted to the competent authority as indicated in AMC M.A. 902 (d).</p>	<p>This is already included in Subpart G.</p> <p>No text changed.</p>
Paragraph (c) 2	
<p>Cmt. 25 / LBA, Germany</p> <p>A verification of compliance with M.A. 902 (b) is not deemed as a sufficient check for the airworthiness of the aircraft. An annual check for compliance with the relevant requirements in accordance with M.A. 710 (a) is more appropriate.</p>	<p>If the AMC M.A 901 (c) 2 only requires to ensure that the aircraft has stayed within the organisation, if that is the case, the organisation knows the aircraft's status and is managing it.</p> <p>No text changed.</p>
Paragraph (a)	
<p>Cmt. 32 / The Royal Aeronautical Society</p> <p>References to Form 15(a) and Form 15(b) should be reversed as the current sentence order is incorrect.</p> <p>Form 4 Currently makes duplicate reference to AMC M.A.606 where it should refer to both AMC M.A.606 and AMC M.A.706.</p>	<p>Text changed.</p>

Comment	Response
Paragraph (d)	
Cmt. 20 / CAA Netherlands	
CAA-NL only wishes to see a list of persons and organisations having carried out cont. airworthiness activities of the last period if they were not within compliance.	This ensures traceability of the work carried out on the aircraft. No text changed.
Cmt. 25 / LBA, Germany	
It is suggested that standard form for the statement required per item g. is used.	Material to be developed at a later date. No text changed.
Paragraph (d)(d)	
Cmt. 22 / KLM	
The intent of the sentence "List of persons or organizations having carried out continuing airworthiness activities including maintenance tasks" must be clarified because this list may become very long if we are talking commercial Operators (KLM Technical department has about a 1000 licensed Ground Engineers)	When an aircraft is maintained by an approved organisation individuals do not have to be listed of course. No text changed.
Paragraph (e)	
Cmt. 34 / ASA Sweden	
The AMC seems to contain definitions. All definitions form part of the requirements and should be found in its respective Part of the requirements.	Text changed.
Paragraph @ (d) (e)	
Cmt. 2 / British Airways	
(a) An Airworthiness Review Certificate is issued in accordance with appendix 3 after a satisfactory airworthiness review and is valid for three years providing the aircraft is maintained within a controlled environment. (b) An aircraft in a controlled environment is an aircraft continuously managed by an M.A. Subpart G approved continuing airworthiness management organisation, which has not changed organisations in the previous twelve months, and which is maintained by approved maintenance organisations. This includes M.A. 803(b) maintenance carried out and released to service according to M.A.801(b)2 and M.A.801(b)3. (c) If an aircraft is within a controlled environment, the continuing airworthiness management organisation managing the aircraft may if appropriately approved: 1 - Issue the airworthiness review certificate in accordance with M.A.710; . 2 - For airworthiness review certificates it has issued, when the aircraft has remained within a controlled environment, the airworthiness management organisation managing the aircraft shall terminate the airworthiness review certificate if it is aware or has reason to believe that the aircraft is unairworthy As an ECAR M operator the aircraft can only be maintained by an ECAR 145 or ECAR 147 accepted maintenance organisation and will therefore always be in a controlled environment. If the organisation responsible for the maintenance management changes, the aircraft would not be in a controlled environment and sub par (d) would apply.	Comment already answered in the rule. Experience shows that the controlled environment is not always maintained during three years. The extendable ARC caters for this case. No text changed.

Comment	Response
SECT A SUB I - AMC M.A. 903	
Paragraph (a)	
Cmt. 25 / LBA, Germany	
A lead time for such information should be specified to allow the timely transfer of information between the competent authorities. The proposed lead time is 10 days.	Part-21 and associated AMC material states that a Certificate of airworthiness will be issued by the competent authority "when it is satisfied" that the aircraft complies with Part 21. Therefore the competent authority can take the time it needs. No text changed.
Paragraph (b)	
Cmt. 25 / LBA, Germany	
Development of AMC's is needed as AMC M.A. 903 (b) request activities of the competent authorities.	The AMC for competent authorities is developed in Part-21 for the transfer of aircraft within the EU. No text changed.

Comment	Response
SECT A SUB I - AMC M.A.904	
Paragraph (a)-2 item (2)(h)	
Cmt. 12 / BMV Austria	
Add in third line after "identification" . "the transponder test, the pitot and static system"	There are also other items and a complete list would not be adapted. Text changed but not as requested.
Paragraph (a)-2 item (2)(j)	
Cmt. 12 / BMV Austria	
Add in third line after "RNAV" ", Extended Overwater Operation"	Text is deemed to be sufficiently descriptive. No text changed.

Comment	Response
SECT B SUB A - AMC M.B.102	
Paragraph (c)	
Cmt. 18 / DGAC, France	
<p>§1.4 five years relevant work experience to be allowed to work as an inspector independently. This may include experience gained during training to obtain the 1.5 qualification. relevant work experience assessed for competence by on the job evaluation</p> <p>§1.5 [...]</p> <p>§ 1.6 Knowledge of the relevant type(s) of aircraft gained through a formalised training course for personnel in charge of airworthiness reviews and a familiarization training course for other personnel</p> <p>§ 1.7 [...]</p> <p>§ 2 [...]</p> <p>§ 3. A programme for continuation training should be developed which provides for the inspectors, at regular intervals, to visit appropriate manufacturers and attend technical symposia as well as training- or refresher-courses to gain first-hand knowledge of new developments. As a general policy, it is not desirable for the inspectors to obtain technical qualifications from those entities under their direct regulatory jurisdiction.</p> <p>JUSTIFICATION: §1.4 assessment of the competence is better than a fixed amount of experience §1.6 formalized training course is only required for personnel in charge of airworthiness reviews §3. If a continuous training is required, details of its content should not be addressed in this AMC</p>	<ul style="list-style-type: none"> - 1.4 takes into account the ICAO airworthiness manual recommendations. - 1.6 modified to require only a sample of aircraft types. - 3 Text changed.
Cmt. 25 / LBA, Germany	
<p>An explanation for „relevant work experience“ should be given. (item 1.4). It is considered impossible to train staff on all relevant types of aircraft by a formalised training course. At least some kind of grouping for such training should be possible.</p>	<p>This is self explanatory. No text changed.</p>
Paragraph (c) 1.6	
Cmt. 25 / LBA, Germany	
<p>Add '(see exemptions described in AMC M.A.902 (e)', because this exemptions may help the authority during the time the implement the rules.</p>	<p>Text changed but not as requested.</p>
Paragraph (c) 3	
Cmt. 25 / LBA, Germany	
<p>A programme for continuation training should be developed for the inspectors.</p>	<p>This is already included in the AMC. No text changed.</p>
Paragraph (c)	
Cmt. 29 / CAA-UK	
<p>The last sentence is not clear and requires further explanation as written seems impractical</p>	<p>Text changed.</p>
Paragraph (c) 3	
Cmt. 12 / BMV Austria	
<p>Change last sentence to: "Inspectors should not only obtain..."</p>	<p>Text changed.</p>

Comment	Response
<p>Cmt. 20 / CAA Netherlands</p> <p>Last sentence: Inspectors should "not" obtain technical qualifications from those entities under their direct regulatory jurisdiction. For independence sake.</p>	<p>Text changed.</p>

Comment

Response

SECT B SUB C - General

Paragraph

Cmt. 25 / LBA, Germany

The wording „aircraft maintenance record system“ should be modified in order to avoid confusion the already existing term „maintenance records“ as defined in PART 145. The term „aircraft maintenance documentation system“ is suggested for use.

Comment	Response
SECT B SUB C - AMC M.B.301	
Paragraph (c)	
Cmt. 18 / DGAC, France	
<p>§ 2 According the complexity of the aircraft and the nature of the operation, the maintenance programme procedures should contain reliability centred maintenance and condition monitored maintenance programme procedures and have procedures relating to the programme control which contain the following provisions: [...]"</p> <p>JUSTIFICATION: Self explanatory</p>	Text changed.
Paragraph (b)	
Cmt. 18 / DGAC, France	
<p>§4A copy of the approved programme should be retained by the competent authority.the Member State, except when the programme is approved by a M.A. Subpart approved organization which should retain a copy instead of the competent Authority"</p> <p>JUSTIFICATION: In this case, holding such a copy is meaningless for the Authority</p>	Text changed.
Paragraph (b) 4	
Cmt. 25 / LBA, Germany	
<p>It should be satisfactory if the approval and revision page is stored by the competent authority.</p> <p>4. ORGANISATION: Name : Divisions B 3 / B 4 / B 5 / U 3 Address : Luftfahrt-Bundesamt, P.O. Box 30 54, 38020 Braunschweig Country : Germany Phone : +49 / 531 / 23 55 - 562 Fax : +49 / 531 / 23 55 - 763 E-mail : Ludwig.Hessler@lba.de</p> <p>5. SIGNATURE: Date: 19th August 2003</p>	<p>When the authority approves a document it is standard practice to retain a copy of such a document.</p> <p>Text amended but not as request.</p>
Cmt. 25 / LBA, Germany	
<p>It should be satisfactory if the approval and revision page is stored by the competent authority.</p>	<p>When the authority approves a document it is standard practice to retain a copy of such a document.</p> <p>Text amended but not as request.</p>

Comment	Response
SECT B SUB C - AMC M.B.303	
Paragraph (c)	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: This AMC is not helping to implement the rule but is rather adding confusion. The first sentence gives the impression that the survey is done on only one aircraft and one operator and the worst one. The second sentence gives the impression that the purpose of the survey is to identify the worst aircraft. The purpose of the survey according the regulation is clearly "to monitor the airworthiness status of the registered fleet", thus it should be representative of that fleet.</p>	<p>The first sentence has been changed to clarify that there is more than one aircraft. The second sentence is intended to help the competent authority to focus resources on difficult areas rather than use these resources on areas known to have no difficulties. Text changed but not as requested.</p>
Paragraph (b) 1 b	
Cmt. 25 / LBA, Germany	
<p>The standard for the ramp checks should be harmonised with the existing requirements for ramp checks in the SAFA programme.</p>	<p>The SAFA programme is a different programme that looks at foreign aircraft from a more general point of view. No text changed.</p>
Paragraph (b) paragraph 1	
Cmt. 29 / CAA-UK	
<p>Suggest adding paragraph 1.c as follows "in-flight surveys, as deemed necessary by the competent authority". This is because it may only be possible to assess some airworthiness risks in flight (e.g. engine performance deterioration or emergency system defects).</p>	<p>Text changed.</p>

Comment	Response
SECT B SUB F - AMC M.B.602	
Paragraph (a)	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: See DGAC comment n° 38 on M.B.602(a) In addition, a document signed by the accountable manager can not be considered as a formal acceptance by the authority. Keeping in the file the qualifications and experience of the managers is more than sufficient.</p>	<p>This is already existing JAA text. No text changed.</p>
Paragraph (e) 1	
Cmt. 25 / LBA, Germany	
<p>Add after 'report form' '(no special form is required)', because the first approach will be to use the EASA Form 6F.</p>	<p>As detailed in AMC M.A.602(f), the EASA form 6F is designed to be the official report form. Nevertheless the AMC M.A.602(e) refers to the audit report and does not refer to EASA form 6F. Text not changed.</p>

Comment	Response
SECT B SUB F - AMC M.B.603	
Paragraph (a)	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: See DGAC comment n° 37 on M.B.601 According M.1 there is only one competent authority: "the authority designated by the Member State where that organisation's principle place of business is located". However co-operation and exchange of information could be encouraged, for example the approving authority could: - contract the local authority for making audits, - invite the local authority for joint audits, or - send copies of the audits it does itself to the local authority.</p>	<p>This is already existing JAA text. No text changed.</p>

Comment	Response
SECT B SUB F - AMC M.B.604	
Paragraph (b) para 4 d	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: This recommendation will almost freeze the audit schedule of large organization. On the other hand, this may drive the Authority to perform only one audit every two year when ICAO recommends performing a yearly audit</p>	<p>This is already existing JAA text. No text changed.</p>

Comment	Response
SECT B SUB G - AMC M.B.702	
Paragraph (a)	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: See DGAC comment n° 41 on M.B.702(a) In addition, a document signed by the accountable manager can not be considered as a formal acceptance by the authority. Keeping in the file the qualifications and experience of the managers is more than sufficient.</p>	<p>This is already existing JAA text. No text changed.</p>
Cmt. 25 / LBA, Germany	
<p>Change item 1 as follows : „ hold a position required by M.A. 706 (b), (c) and (d).“</p>	<p>Text changed.</p>
Paragraph (b)	
Cmt. 33 / CAA Belgium	
<p>AMC M.B. 702 (b) Initial approval 1. The competent authority should indicate approval of the continuing airworthiness organisation management exposition in writing 2. Contracts : should be included in the continuing airworthiness organisation management exposition. Reason: Continuing Airworthiness Management Exposition is the term used in the rules M.B. 701 (a) 1 for example)</p>	<p>Text Changed.</p>
Paragraph (c) para 3	
Cmt. 34 / ASA Sweden	
<p>The AMC seems to contain a requirement (" shall"). Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.</p>	<p>Text changed.</p>

Comment	Response
SECT B SUB G - AMC M.B.703	
Paragraph (a)	
Cmt. 20 / CAA Netherlands	
<p>CAA-NL fully sees the relevance and the logic to including reference to Maintenance Programmes on the approvals for a CAMO as part of the OAC. This simplifies the control of the approval in the case of fleet modifications in number of aeroplanes in stead of the use of registrations on the approval.</p> <p>However for a CAMO giving Maintenance support in the General Aviation the approval could be well defined by Aircraft make and model or series of models to simplify the control of the approval. If a CAMO i.e. supports a number of different configured Cessna 172's and Piper 28's for various customers the Approval will be filled up with reference Approved Maintenance Programmes. By the approval of the MP's in itself and the approval of the CAMO the relevant Maintenance documentation is assured and the suggested low level of detail on the approval gives the same control with less administration.</p> <p>Proposed Text: AMC M.B.703(a)2. The approval should be based upon the aircraft maintenance programme (or documentation) relative to M.A.....</p> <p>Note 1 relevant for AOC operations = present Note.</p> <p>Note 2 For example if the organization is capable of supporting the maintenance within the limitation of M.A. Subpart G the Cessna single engine series the approval schedule should state Cessna Single engine, or Cessna 172 series.</p>	<p>In the controlled environment, the continuing airworthiness management organisation, if the competent authority agrees, develops and approves through a procedure, its own maintenance programmes. Referencing the programmes on the form 14, allows the competent authority to monitor the programmes used. If a new programme is developed, the member state will be informed and review the programme as necessary.</p> <p>No text changed.</p>
Cmt. 25 / LBA, Germany	
<p>The word „maintenance“ in the term „maintenance organisation facilities“ needs to be replaced by the word „continuing airworthiness management“ as this procedure deals with the approval of continuing airworthiness management organisations (3 places).</p>	Text changed.
Paragraph (a) para 1	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph.</p> <p>JUSTIFICATION: According M.1 there is only one competent authority: “the authority designated by the Member State where that organisation’s principle place of business is located”. However co-operation and exchange of information could be encouraged, for example the approving authority could: -contract the local authority for making audits, -invite the local authority for joint audits, or -send copies of the audits it does itself to the local authority.</p>	<p>This is already existing JAA text.</p> <p>No text changed.</p>
Paragraph (d) para 1	
Cmt. 34 / ASA Sweden	
<p>The AMC seems to contain a requirement (“will be indicated”). Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.</p>	Text changed.

Comment

Response

Paragraph ©

Cmt. 12 / *BMW Austria*

In the first line replace "Part-M Subpart G1" by "M.A. Subpart G".

Text changed.

Comment	Response
SECT B SUB G - AMC M.B.704	
Paragraph (b) para 4 d	
Cmt. 18 / DGAC, France	
<p>Propose to delete paragraph. JUSTIFICATION: This recommendation will almost freeze the audit schedule of large organization. On the other hand, this may drive the Authority to perform only one audit every two year when ICAO recommends performing a yearly audit.</p>	<p>This is already existing JAA text. No text changed.</p>

Comment

Response

SECT B SUB I - AMC M.B.901

Paragraph *para 3*

Cmt. *34 / ASA Sweden*

The AMC seems to contain an exception from the requirement in M.B.902 (b), meaning this AMC, i.e. AMC M.B. 901 para 3, contains a requirement.
Delete the paragraph and insert the requirements in Part M or change the wording to clarify the non-mandatory status of the AMC.

Text changed

Comment	Response
SECT B SUB I - AMC M.B.902	
Paragraph (c)	
Cmt. 18 / DGAC, France	
<p>- The minimum content [...] - Responsibilities of current job Every personnel of the Competent Authority in charge of Airworthiness Review when the Regulation is promulgated will keep the same privilege for 10 years. For new aircraft (new manufacturer or new design for existing manufacturer in the scope of work), the inspector will have to fulfill this requirement for the type training course. 4.JUSTIFICATION: As it was done for the implementation of JAR 66, this provision will allow continuation of services for Airworthiness review.</p>	Text changed but not as requested.
Paragraph (b) (2)	
Cmt. 12 / BMV Austria	
<p>In AMC M.B.902(b)(2) the text should read: "An appropriate Part 66 qualification is a category B or C licence.....or for aircraft other than aeroplanes and helicopters a qualification according to Part 66 Subpart B"</p>	<p>Balloons and gliders are dealt with by "equivalent qualification" in the rule. Text changed but not as proposed.</p>

Comment	Response
Appendix 1	
Paragraph 1.1	
Cmt. 20 / CAA Netherlands	
The possible variation as stated within the manufacturers maintenance instructions may part of the approved maintenance programme.	This is considered to be sufficiently addressed via items 1.1.7, 1.1.10 and 1.1.11 No text changed.
Paragraph 4	
Cmt. 20 / CAA Netherlands	
Variations in the approved programme only need the approval of the competent authority if they exceed the approved variations in the approved maintenance programme	This is considered to be sufficiently addressed via items 1.1.7, 1.1.10 and 1.1.11 No text changed.

Comment	Response
Appendix 2	
Paragraph 1.3	
Cmt. 21 / ERA	
<p>This paragraph would require the sub-contracting operator to be conversant with the workload of any potential sub-contractor. It is our opinion that the level of knowledge in this respect that any operator may have of its sub-contractors, especially in the early stages of the relationship, would be minimal. It is felt that, if an operator is assured by potential sub-contractor that it is within their resources to carry out the task, this would be sufficient. Furthermore, it is unlikely that any sub-contract organization would provide in-depth data in respect to its workload to anyone, potential customer or not. How would the Agency respond to this?</p>	<p>This appendix is existing JAA TGL 34 text. Furthermore, it is the operator's responsibility to ensure that there is sufficient personnel in the continuing airworthiness management system.</p> <p>No text changed.</p>
Paragraph 1.7 Note	
Cmt. 21 / ERA	
<p>Can the Agency please explain the rationale behind allowing the procedures of the continuing airworthiness management exposition to prevail? Does this not conflict with responsibilities held by the operator?</p>	<p>This appendix is existing JAA TGL 34 text. Furthermore, it is the operator's procedures that must be followed in the continuing airworthiness management system.</p> <p>No text changed.</p>
Paragraph 1.8	
Cmt. 21 / ERA	
<p>I believe that this paragraph needs to be more specific to those procedures that are being used in direct connection with the contract. However, in its current format, this paragraph implies that all procedures need to be agreed by the operator prior to amendment.</p>	<p>This appendix is existing JAA TGL 34 text. Furthermore, changes to the sub-contractor's procedures could affect the continuing airworthiness management system.</p> <p>No text changed.</p>
Paragraph 2	
Cmt. 25 / LBA, Germany	
<p>After the headline "2. Accomplishment" of Appendix 2 a paragraph should be added that clearly explains that the following paragraphs detail topics which should be covered by such a contract. A comparable wording was included in paragraph 2 of former TGL 34. Suggested wording: „This paragraph describes topics, which may be applicable in such a contract arrangement. It therefore follows that where relevant the Operator is to establish to a level which meets the intent of Part M and satisfies the competent authority, the necessary maintenance management, controls, policies and associated supporting procedures with the sub-contracted organization.“</p>	<p>Text changed.</p>
Paragraph 2.13	
Cmt. 25 / LBA, Germany	
<p>Paragraph 2.13 "Defect Control" of Appendix 2 should be amended to meet the intention of paragraph 2.13 of former TGL 34. Paragraph 2.13. of TGL 34 contained a reference to TGL 12 paragraph 4.5, which requires the operator to decide upon the deferment of discrepancies.</p> <p>Suggested wording to be added at the end of paragraph 2.13: „For all other defects identified during maintenance, this information should be brought to the attention of the operator who is dependant upon the procedural authority granted by the competent authority may determine that some defects can be deferred.“</p>	<p>Text changed.</p>

Comment	Response
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Paragraph *Item 2.2*

Cmt. *15 / Lufthansa Technik AG*

The operator should have in place a system to monitor and assess the effectiveness of maintenance programme based on maintenance and operational experience. The collection of data and _ assessment may be made by the sub-contracted organisation; the required actions are to be endorsed by the operator.
Delete: "initial"

Initial is oposed to any amendment later in the sentence.
No text changed.

Cmt. *16 / Lufthansa Technik*

The operator should have in place a system to monitor and assess the effectiveness of maintenance programme based on maintenance and operational experience. The collection of data and _ assessment may be made by the sub-contracted organisation; the required actions are to be endorsed by the operator.

Initial is oposed to any amendment later in the sentence.
No text changed.

Comment

Response

Appendix 3

Paragraph **Appendix 3 M.B.303(d)**

Cmt. **12 / BMV Austria**

Change Cert. Maintenance Requirement to "Airworthiness Limitation" or add "Airworthiness Limitation"

Text changed.

Comment

Response

Appendix 4

Paragraph

Cmt. 20 / CAA Netherlands

Part B : Tools last bullit:
•calibration frequencies (and standards) as stated in AMC M.A.608 (b).
Part E second -: This provides for subcontracting although this is not defined as a privi
in M.A.615 as it is stated in Part 145.A.75.

Part B
This extra information has not been put for the other items and there is no
justification to act differently on this one.

No text changed.

Part E Correct this is due to the absence of a quality system.

Text changed.

Comment	Response
Appendix 5	
Paragraph	
Cmt. 22 / KLM	
Part three of this appendix differs from appendix 2 to AMC OPS 1.905 (a) part three JAR-OPS does not require Quality audit of aircraft, however appendix 5 to AMC. 704 part 3.2 does	Product sampling is a part of AMC-OPS 1.900 that had not been introduced into appendix 2 to AMC OPS 1.905 (a). The requirement for product sampling has been transferred to the AMC to Subpart G. It was felt that this slight change would help continuing airworthiness management organisations to organise this activity and competent authorities to monitor it. No text changed.
Cmt. 25 / LBA, Germany	
Replace the detailed example for one exposition by more general guidelines for the content of different possible expositions. Reasons : a) The given structure is not covering all possible combinations of approvals that could be held by an organisation (i.e. AOC, JAR 21). b) Organisation may need or want to comply with other regulations that will require other subjects to be included into the exposition. If the given structure is too rigid for such variations to the handbook other means will be established. These additional means will be known from human factors - impact the compliance with the exposition and may so impair aircraft safety. Proposal : a) Replace existing content by the examples from AMC M.A. 704 items 2. and 3. and add other examples as needed. b) Move the detailed proposal to the guidance material section.	AMC M.A.704 clearly states that this is an example of a CAME layout and gives general guidance for stand alone and Part-145 approved organisations. The AMC shall be amended to include the possibility of combinations. Text changed but not as requested.
Paragraph <i>Item 0.4 a) General organisation chart</i>	
Cmt. 12 / BMV Austria	
1. Replace the post holder for finance by ground operations and marketing by training. 2. Add a post holder for maintenance for the case of a combined operator and part 145 maintenance organisation.	1. Text changed but not as requested. 2. This would not be in line with the rule. No text changed.
Paragraph <i>Item 0.4 b) Maintenance management & organisation chart</i>	
Cmt. 12 / BMV Austria	
Change the title to "b) Continuing airworthiness management organisation chart"	Text changed
Paragraph <i>part 0, 0.4 b</i>	
Cmt. 21 / ERA	
This paragraph gives guidance on the Maintenance management & organization chart. The "example below" stated in line 4 does not appear.	Text changed.

Comment

Response

Paragraph *part 0, 0.5*

Cmt. *21 / ERA*

This paragraph states that "Joe Bloggs will not incorporate such change until the change has been assessed and approved by the competent authority" This is not possible in all cases. How would the Agency cater for such events as unforeseen changes in personnel that can happen for a myriad of reasons, such as resignation, summary dismissal or, in the worst case, death?

This is addressed in the regulation in M.A.713.
No text changed

Comment

Response

Appendix 6

Paragraph *EASA for 6f part 4*

Cmt. *25 / LBA, Germany*

The lines for the signatures of the surveyors and the quality manager / accountable manager should be kept from the JAA Form Six Part 4.

There is no such provision in part 4 of the published JAA Form 6.

No text changed.

Comment	Response
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Appendix 9

Paragraph

Cmt. 11 / *Foca Switzerland*

Expressions in the scope of Part 145 and PartM/Subpart F Approvals (page 2 of EASA Form 2) shall be harmonised with expressions of ratings in the Part 66 Aircraft Maintenance Licence. This is especially important in case of series.

This is the existing JAA rating system for maintenance organisations.

No text changed.

Cmt. 20 / *CAA Netherlands*

Typo: example A2, Cessna line maintenance is non exiting in Subpart F

Text changed.

Comment

Response

Appendix 10

Paragraph

Cmt. 11 / Foca Switzerland

EASA Form 4 shall be formatted such that it can be used under all Parts that require acceptance of Management Personnel by the Competent Authority, i.e. Part 145, Part 147, Part 21/Subpart G, Part M/Subpart F.

Text changed.

Comment	Response
General Comments	
Paragraph	
Cmt. 18 / DGAC, France	
As AMCs are not mandatory, the terms "must", "shall" and perhaps "should", should be removed from the text. The use of the expression "may" would prevent any confusion introduced by ambiguous terms.	Text reviewed and changed where applicable.
Cmt. 25 / LBA, Germany	
In general the wording 'EASA Form One' and 'JAA Form One' should be used instead of mixing this wording with '...1'.	"One" will be changed during transaltion whereas "1" is the same throughout Euro No text changed.
Cmt. 34 / LUFTFARTSVERKET, Aviation Safety Authority (ASA)	
<p>Documents in general need an editorial review in regard of language and consistency, for example:</p> <p>The titles of the drafted material should have the same structure. There is total inconsistency in whether the titles of the drafted material (in this case both the Implementation Rules and the Acceptable Means of Compliance and Guidance Material) shall be written with or without the "-" between the word "Part" and the specific letter or number of each part, i.e. M, 66, 145 or 147.</p> <p>All AMC or GM paragraph numbers should have the same structure. At present they are different in different Parts. GMs to Part 145 are called "GM (a paragraph)", see for example GM 145.A.70 (a), whereas GMs to Part 147 are called "Guidance to (a paragraph)", see example Guidance to 147.A.1.</p> <p>All AMC and GM headings should be the same as those of the requirements that they are referring to. In the drafted material, there are AMCs and GMs with a different heading than the requirement that they refer to. For example, some AMCs contain headings that have been shortened (see AMC M.A. 606).</p> <p>Regarding appendices, the following should apply:</p> <ul style="list-style-type: none"> - Appendices should be avoided. Forms and such should be inserted under an AMC or a GM. - If it is necessary to use appendices, there should be a reference in an AMC or a GM to an appendix that can be found in the material. Frequently, there are appendices attached to the material where no reference can be found in the AMCs or GMs. - In the heading of all appendices, and preferably on all pages included in an appendix, it should be clearly indicated that the appendix or page forms part of an AMC (see for example both appendices, Appendix 1 and Appendix 2, to AMC and GM to Part 145, where nothing indicates that their provisions contain acceptable means of compliance). - In order to provide acceptable means of compliance or guidance material that is easy to recognise for all users, all forms should retain their original numbers. - It is also preferable that all relevant forms which have been developed by JAA are inserted in the AMC/GM-material. Thus, "Form 12" for the application of a 147-organisation approval, should be inserted in the AMC material for Part 147. 	This review will be carried out by the agency as soon as a consolidated text is available for adoption.

Comment	Response
<p>Cmt. 34 / LUFTFARTSVERKET, Aviation Safety Authority (ASA)</p> <p>Regulation (EC) No 1592/2002 article 56.2 reads: "During an additional transition period of 42 months from the date referred to in paragraph 1, Member States may continue to issue certificates and approvals by way of derogation from the provisions of Articles 5, 6, 9 and 15 under the conditions specified by the Commission in the implementing rules adopted for their application....."</p> <p>The time aspect is a general problem that has to be addressed. The time given for consultation have been too short considering that the material is extensive and that acceptable means of compliance (AMC) and guidance material (GM), as well as the proposed implementing rules need more review before they can be considered ready for adoption.</p> <p>The entry into force dates in general does not allow neither authorities nor the market enough time to adjust. This can have serious effects on the industry and certain activities may have to shut down. We cannot accept this to happen because enough time is not allowed and this could definitely not have been the purpose.</p> <p>We therefore recommend that the 42 month transition period is used to give everyone involved reasonable time to adjust and prepare.</p>	<p>The transitional aspects are addressed in the regulation. Once it is published, the associated AMC supporting it also need to be published. The AMC are Agency documents and can therefore be amended through a process deferring for the EU decision making process.</p> <p>No text changed.</p>

Comment	Response
OTHER	
Paragraph	
Cmt. 2 / British Airways	
<p>TGL 34 Operators with sub contracted Technical Services Subpart M Support</p> <p>Have NAA leaflets been reviewed and incorporated into ECAR's as ECAR M does not state it is acceptable to contract out Aircraft Technical Services, ie maintenance programme control, currently this acceptable practice Mandatory Occurrence Reporting, It is not clear as to whom these reports will be sent ie Local NAA or a central ECAR's group.</p>	<p>The first issue is addressed in appendix 2 to the AMC based on TGL 34.</p> <p>Occurrence reporting is addressed in the rule. See M.A.202.</p> <p>No text changed.</p>
Cmt. 5 / Monarch Aircraft Engineering Ltd	
<p>Article 10.3 States Member States may grant exemptions from the substantive requirements laid down in the Regulation and its implementing rules in the event of unforeseen urgent operational circumstances or operational needs of a limited duration, provided the level of safety is not adversely affected thereby. The Agency, the Commission and the other Member States shall be notified of any such exemptions as soon as they become repetitive or where they are granted for periods of more than two months</p> <p>The operator needs the flexibility to grant exemptions to its Maintenance programme for unforeseen occurrences. Under the proposal this flexibility has been removed from the operator. Exemption to Mandatory tasks and Airworthiness Directive are still approved by the NAA.</p> <p>Exemptions granted by the operator are not notified to the NAA within the limits stated in the approved maintenance programme unless a trend is identified.</p>	<p>Item 4 of Appendix 1 to the AMC has been amended to reflect this issue.</p> <p>Text changed.</p>
Cmt. 11 / Foca Switzerland	
<p>For the sake of standardisation,</p> <p>the AMC paragraphs of the various Parts relating to the same systemic procedures shall be written in consistent manner (same wording), i.e. for the initial certification of organisations, for the conduct of audits, for the processing of findings, for the limitation/suspension/revocation of approvals etc., be it i.a.w. Part 145, Part M/Subpart Part 147, Part 21/Subpart G.</p> <p>Forms containing the same kind of information shall have a consistent format throughout all Parts they are used for, i.e. page 1 of application form (EASA Form 2), EASA Form 4 (acceptance of management personnel), page 1 of approval certificates, page 1 of approval recommendation reports (EASA Form 6/6F)</p> <p>AMC & GM paragraphs on organisation expositions/manuals (MOE, MOM, MTOE, POE) shall be written in consistent manner (same wording), i.e. guidance to structure, amendment and approval procedures etc. This is especially important in case an organisation, applying for several approvals, establishes joint management chapters of expositions/manuals.</p> <p>Options for the unlimited/limited issue of certificates shall be consistent for all kinds of organisation approvals.</p>	<p>This review will be carried out by the agency as soon as a consolidated text is available for adoption.</p>

Comment	Response
Cmt. 20 / CAA Netherlands	
<p>CAA-NL is using digital systems to generate several forms required by the JAA. CAA-NL has the intention to use similar digital systems to create the forms required by EASA. However, the proposed design of the forms makes it difficult to generate them by using computerized systems. Most of the proposed forms are designed by using boxes, frames and lines. Especially forms with a dynamic quantity of text to be put in a box or a frame are requiring a lot of programming in order to get a acceptable result.</p> <p>CAA-NL proposes to following;</p> <p>Make a general design for all forms to be use by the Member States/ Competent Authorities in order to make them easily recognizable as EASA forms</p> <p>The use of boxes and lines should be limited to the headers and footers only.</p> <p>The layout of the body of the forms should be simple text or one simple table.</p> <p>The comment is applicable for at least the following forms; EASA Form 6, EASA Form 6 EASA Form 13, EASA Form 56 and EASA Form 58.</p>	<p>These forms are AMC. Therefore, the forms issued by the competent authority need not be identical.</p> <p>No text changed.</p>
Cmt. 25 / LBA, Germany	
Development of AMC 's is needed as AMC M.A. 201 (h) 1, items 2. and 13. request activities of the competent authorities	<p>Items 2 and 13 do not need to be developed further as there is an appendix to the AMCs addressing these issues.</p> <p>No text changed.</p>
Cmt. 25 / LBA, Germany	
A definition for 'secure manner should be given'.	<p>Text is considered to be specific enough.</p> <p>No text changed.</p>
Cmt. 31 / Martinair Holland NV	
<p>In case of Leaflet 26 we recommend to let definition of the allowable limits be part of the OMP, this way the Operator is responsible for setting its limitations for extensions as per Appendix 1 to AMC M.A.302 and AMC M.B.301(b) item 4.</p> <p>This way the approval of the OMP by the competent authority also includes the approval mentioned in Appendix 1 to AMC M.A.302 and AMC M.B.301(b) item 4.</p> <p>The figures mentioned in Leaflet 26 should be guidance only.</p> <p>Some Leaflets are also not incorporated into AMC to AMC M we recommend to publish those leaflets as GM to Part M, since no GM to Part M exists:</p> <ul style="list-style-type: none"> - Leaflet 15: JAR-OPS 1&3 Subpart M Contracted Maintenance - Leaflet 25: Reliability Programs - Leaflet 28: The Impact Aircraft Leasing on the Operator's for Maintenance 	<p>Text changed to reflect comment.</p> <p>TGL 15 and 25 have been added as an appendix to the AMC.</p> <p>The publication of TGL 28 will be decided by the Agency at a later date.</p>
Cmt. 33 / CAA Belgium	
Propose different text A text equivalent to JAA TGL 25 about Reliability Programme should be taken on board	Text changed.
Cmt. 33 / CAA Belgium	
Propose different text A model contract with a part-145 organisation should be proposed.	Text changed.

Comment	Response
<p>Cmt. 33 / CAA Belgium</p> <p>Propose different text Appendix 2 Sub-contracting of continuing airworthiness management tasks</p> <p>By Appendix 2 to AMC M.A. 201 (h) 2 Sub-contracting of continuing airworthiness management tasks</p> <p>Pour plus de clarté références telles qu' utilisées dans appendix 5 to MAC M.A. 704</p>	Text changed.
<p>Paragraph (f)</p>	
<p>Cmt. 29 / CAA-UK</p> <p>Change text to read "aircraft mainly operated in another member state" to replace "competent authority".</p>	
<p>Paragraph (h) 1 paragraph 13</p>	
<p>Cmt. 29 / CAA-UK</p> <p>It is proposed to remove this paragraph as the acceptance of the contract by listing it o the AOC will be onerous to keep it up to date particularly for the small light AOC's.</p>	<p>This is existing JAA text.</p> <p>No text changed.</p>
<p>Paragraph AMC Subpart F</p>	
<p>Cmt. 27 / FAA USA</p> <p>Maintenance must be approved by a sub. Part F, for small aircraft and components for us on those aircraft.</p> <p>BASA/MIP may need to address this issue because the MIP only address part 145 AMOs/CFRS. CFR part 145 has rating for all aircraft and components, IR-Part M, allow person or organization to perform maintenance on these aircraft. This is similar procedu as set forth under the CFRs. However, certain items may be addressed regarding certification of individuals to perform maintenance on small aircraft.</p>	<p>Presently, there is no bilateral agreement between the FAA and Member States in place for the existing equivalent small aircraft maintenance orgnasations approved nationally.</p> <p>This issue could be addressed in the future once the Part-145 issue has been finalised if there is a commercial need as Part-145 and Part-M are two different subjects.</p> <p>No text changed.</p>
<p>Paragraph Form 4</p>	
<p>Cmt. 32 / The Royal Aeronautical Society</p> <p>Form 4 currently makes duplicate reference to AMC M.A.606 where it should refer to bo AMC M.A.606 and AMC M.A.706.</p>	Text changed.
<p>Paragraph M.B.302 Exemptions</p>	
<p>Cmt. 2 / British Airways</p> <p>The operator needs the flexibility to grant exemptions to its Maintenance programme for unforeseen occurrences. Under the ECAR proposal this flexibility has been removed from the operator. Exemption to Mandatory tasks and Airworthiness Directive are still approv by the NAA.</p> <p>Exemptions granted by the operator are not notified to the NAA. (ie up to three months c 500 flying Hrs/cycles) unless a trend is identified.</p>	<p>Item 4 of Appendix 1 to the AMC has been amended to reflect this issue.</p> <p>Text changed.</p>

Comment

Response

Paragraph **MA 502**

Cmt. 11 / Foca Switzerland

M.A.502 Component maintenance

(a) The maintenance of components shall be performed by appropriately approved Subpart F or Part 145 maintenance organisations.

(b) Maintenance on any component may be performed by M.A.801(b)2 certifying staff or whilst such components are fitted to the aircraft. Such components, nevertheless, can be temporarily removed for maintenance when such removal is expressly permitted by the aircraft maintenance manual to improve access for maintenance. manual to improve access for maintenance.

This is a comment to the rule.

Text has been changed in the rule.