

CRD - GM to Part 147

Comment	Response
147.A.1	
Paragraph	
Cmt. 34 / <i>ASA Sweden</i> The GM seems to contain a requirement. Delete the paragraph and insert the requirements in Part 147 or change the wording to clarify the non-mandatory status of the GM.	Text changed.

Comment	Response
147.A.30	
Paragraph (i)	
Cmt. 34 / ASA Sweden	
Insert the word "to" in the heading of this GM (see all other GMs to Part 147).	Text changed.
Paragraph (l)	
Cmt. 30 / KLM E&M	
Guidance 147 . A. 30 (l) Library Technical material could also be made available in digital form (e.g on-line manuals). Referral to a library therefore would be incorrect. Maybe it is better to refer to multi-med type of information carriers.	This paragraph does not forbid technical material from being made available in dig form. It only gives guidance on how to manage the library, if it exists when an organisation has multiple approvals. No text changed.

Comment

Response

147.A.60

Paragraph para 5

Cmt. 34 / ASA Sweden

The GM seems to contain a requirement in its first sentence. Delete the paragraph and insert the requirements in Part 147 or change the wording to clarify the non-mandatory status the GM.

Text changed.

Comment

Response

147.B.210

Paragraph para 6

Cmt. 34 / ASA Sweden

The indicated paragraph seems to contain requirements ("...must..."). Delete the paragraph and insert the requirements in Part 147 or change "must" to "should".

Text changed.

Comment**Response****147.B.215****Paragraph****Cmt. 34 / ASA Sweden**

Guidance to 147.A.215

The heading should be Guidance to 147.B.215, since it contains guidance material to 147.B.215 which is located in subpart B.

All paragraphs (para 1 to 8) in this GM specify the scope of the requirement in 147.B.215. As

such, they seem to constitute requirements. Proposal :

Delete the paragraph and insert the requirements in Part 147 or change the wording to clarify

the non-mandatory status of the GM.

Item 1: Text changed.

Item 2: Guidance to 147.B.215 is not a requirement. It only details the consequences of certain changes as specified in 147.A.75 and gives guidance to the competent authority on how to handle certain specific cases. No text changed.