

CRD - GM to Part 145

Comment	Response
GM 145.A.10	
Paragraph	
Cmt. 1 / British Airways Engineering UK	
<p>No Guidance Material is provided for large maintenance organisations in paragraph GM 145.A.10.</p> <p>Section GM 145.A.30 (j)(4) contains (Flight crew) personnel requirements and has no relevance to maintenance organisations.</p>	<p>Existing JAA text.</p> <p>No text changed.</p>
Cmt. 31 / Martinair Holland NV	
<p>AMC 145.A.10 - Leaflet 6: AMC 145.A.10 only copies the definition form Leaflet 6 paragraph 4.3. The rest of the text of Leaflet 6 is not transferred into Part 145, AMC 145 of GM 145 as stated in the explanatory note. The remaining text of Leaflet 6 should be incorporated in GM 145.A.10.</p>	<p>The remainder of the text defined in TGL 6 deals with references to JAR 145 Section 2 text. Elements of this text have been added to the GM to 145.A.10.</p> <p>Text changed but not as requested.</p>
Paragraph paragraph 3	
Cmt. 12 / BMV Austria	
<p>The scope of a one man maintenance organisation should be limited to line maintenance and/or components.</p>	<p>Existing JAA text.</p> <p>No text changed.</p>

Comment	Response
GM 145.A.55	
Paragraph (a) 6	
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>	<p>Existing JAA text. No text changed.</p>

Comment	Response
GM 145.A.70	
Paragraph (a)	
Cmt. 31 / <i>Martinair Holland NV</i>	
The note of item 9 still mentions the RLD, this should be CAA-NL.	Text changed.
Paragraph (a) 8 d	
Cmt. 21 / <i>ERA</i>	
This paragraph makes reference to EU OPS. As this document is still in draft format, is this reference correct?	Text changed.

Comment	Response
<i>Other</i>	
Paragraph	
Cmt. 23 / Britih Airways	
Issue: Section GM 145.A.65 (b) is incorrectly references in both the heading and Note 2. The should read GM 145.A.65 (c) and AMC 145.A.65 (c) respectively.	Text changed.
Cmt. 23 / Britih Airways	
Issue: Since the submission of comments on GM material on 15th July 2003, substantial addi have been made to the document. However, it would appear that the IR has also been amended, without any visible means of revision control (i.e. bar lines against revised text) such that the wording in GM 145.A.60 (c) no longer reflects that used in IR 145.A.60 (c). GM 145.A.60 (c) states "In a manner established by the competent authority means", whereas IR 145.A.60 (c) states "in a form and manner established by the Agency". In addition, the previously submitted comment for 145.A.60 (c) quoted the text as "in a form and manner acceptable to the Agency but reportable to the competent authority".	Text changed.