

CRD - GM to Part 147

Comment		Response	
147.A.1			
Paragraph			
Cmt. 34 / ASA Sweden			
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 paragra 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.