

**Comment Response Document (CRD)
to Notice of Proposed Amendment (NPA) 19-2006**

**amending Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance
licence to Annex IV Acceptable Means of Compliance to Part-66 of Decision No.
2003/19/RM of the Executive Director of the Agency of 28 November 2003**

on

**acceptable means of compliance and guidance material to Commission
Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing
airworthiness of aircraft and aeronautical products, parts and appliances, and
on the approval of organisations and personnel involved in these tasks**

Appendix I

Aircraft Type Ratings for Part-66 Aircraft Maintenance Licence

Explanatory Note

I. General

1. The intention of Notice of Proposed Amendment (NPA) No 19/2006, dated 19 December 2006, was to envisage amending Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence to Annex IV Acceptable Means of Compliance to Part-66 of Decision No. 2003/19/RM of the Executive Director of the Agency of 28 November 2003 on acceptable means of compliance (AMC) to Part-66 (hereinafter referred to as Part-66 AMC Appendix I) of Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks (Commission Regulation (EC) No 2042/2003).¹ The scope of this rulemaking activity is outlined in ToR 66.003.

II. Consultation

2. NPA No 19/2006 was published on the EASA web site (www.easa.europa.eu) on 20 December 2006.

By the closing date of 6 February 2007, the Agency had received 85 comments from national authorities, professional organisations and private companies.

3. NPA No 19/2006 was drafted as a proposal to amend Decision 2006/06/R of 31-07-2006 of the Executive Director of EASA on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003.
4. After legal review, it was found that, for formal reasons, the NPA should instead have been drafted as an amendment to the original ED Decision No. 2003/19/RM of the Executive Director of the Agency of 28 November 2003 on acceptable means of compliance (AMC) to Part-66 of Commission Regulation (EC) No 2042/2003 of 20 November 2003.
5. Bearing in mind that the technical substance of the consulted NPA 19/2006 is not affected by the necessary correction of the formal oversight, the Agency can proceed with the rulemaking process and propose this CRD and Decision for final consultation.
6. During the legal review mentioned above, it was also found that Decision No 2006/06/R was issued as an amendment to Decision No 2005/07/R of 19 December 2005 when it too should have been issued as an amendment to Decision No. 2003/19/RM. To correct this formal mistake, Decision 2006/06/R should be repealed. No rights established under Decision No 2006/06/R will be lost by this measure.
7. Decision 2005/07/R was correctly issued as an amendment to Decision 2003/19/RM and should therefore not be repealed.

¹ OJ L 315, 28.11.2003, p. 1. Regulation as last amended by Commission Regulation (EC) No 376/2007 of 30 March 2007 (OJ L 94, 4.4.2007, p.18).

III. Publication of the CRD

8. All comments received have been acknowledged and incorporated into a Comment Response Document (CRD). This CRD contains a list of all persons and/or organisations that have provided comments and the answers of the Agency.
9. In responding to comments, a standard terminology has been applied to attest EASA's acceptance of the comment. This terminology is as follows:
 - **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
 - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
 - **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
 - **Not Accepted** - The comment is not shared by the Agency.
10. Agency Decision 2007/009/R is issued together with the publication of this CRD. Any reactions to this CRD will be taken into account in the next review.
11. Such reactions should be received by EASA not later than **10 July 2007** and should be sent by the following link: CRD@easa.europa.eu.

CRD to NPA 19-2006

Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
1.	Appendix 1 1. Large aircraft <i>Page 8 of 15</i>	Flybe, UK	<p>Embraer ERJ-190/495 (GE CF34)</p> <p>Why has the Embraer ERJ 190-200 (Embraer 195) been removed from the proposed type rating list? Surely standardisation would mean that there should be a type rating designation of ERJ-190 100/200 as is the case with the ERJ-170 100/200?</p> <p>Without provision for a type rating for the Embraer 190-200 (Embraer 195), Part 145 authorisation cannot be given and aircraft maintenance on that type cannot be certified.</p>	<p>Accepted</p> <p>Refer to answer to comment 83 from Regional, designation of all variants 170-100/200 and 190-100/200 are grouped in a single type rating. Correction has been made to introduce both models with the certification type description, Embraer 195 will not be mentioned as the TCDS states that:</p> <p>“Note 2 - The models ERJ 190-200 are often referred to in Embraer marketing literature as “EMBRAER 195”. The ERJ 190-200 IGW is referred to in Embraer marketing literature as “EMBRAER 195 AR”. These names are strictly marketing designations and are not part of the official models designation”, and no commercial designation should be retained in the Appendix I.</p>	Embraer ERJ-170/190 (GE CF34)
2.	Appendix 1. 5. Aeroplane multiple piston engines <i>Page 10 of 15</i>	Nayak Aircraft Service GmbH & Co. KG	<p>Twin Rockwell Commander (Gulfstream/Rockwell/Aerocommander) 685 (Continental)</p> <p>This Aircraft is with the Type Change to Commander 690 and following models (acc to German Kennblatt 2014 Revision 22) equipped with Honeywell TPE 331 Engine. This Version is not listed under point 3 of this list.</p>	<p>Accepted</p> <p>New aircraft in group 3.</p>	<p><u>Twin Commander (Gulfstream/Rockwell/Aerocommander) 690 (Honeywell TPE 331)</u></p>
3.	Appendix 1 1. Large aircraft <i>Page 8 of 15</i>	Nayak Aircraft Service GmbH & Co. KG	<p>Raytheon (BAe) 125 Hawker 800/800XP</p> <p>With TCDS IM.A.085 Issue 1 dated 17 June 2006 - Hawker 850XP was certified by EASA as a separate Type. This Version is not listed.</p>	<p>Accepted</p> <p>According to TCDS the Collins Pro Line 21 creates the difference between 800XP and 850XP, thus enabling the two variants to be grouped.</p>	Raytheon (BAe) 125/Hawker 800/800XP/850XP (Honeywell TFE731)
4.	Appendix 1 6. Aeroplane single piston	CZ CAA	Group 6 and 10 – Aircraft types Sukhoi Su-29, Su-31, Su-26 are included in both group 6 and group 10. With regard to the compound	<p>Accepted</p> <p>Aircraft transferred in group 10.</p>	

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	Engine – metal structure		(composite) structure of these aircraft we recommend including of all the three types in group 10 only.		
5.	Appendix 1 4. Aeroplanes single turbine engine (ASTE) of 5700kg and below...	CZ CAA	Group 4 - “Moravan (Zlin) Z-37T/137T” – editorial change in accordance with records of other types Moravan (Zlin) in group 6.	Accepted Aircraft transferred in group 6.	
6.	Appendix 1 11. Multi-engine helicopters (MED)...	CZ CAA	There is not helicopter type PZL Kania (RR Corp 250) included in the list. We recommend including of this type in group 11.	Accepted Aircraft added in group 11.	
7.	Appendix 1 Type ratings	Luftfahrt-Bundesamt	<p>The modification of the Aircraft Type Rating List in NPA No. 19-2006 causes several problems which should be addressed.</p> <p>1. There are some aircraft types listed in a way that might be misunderstood. For example type approvals according to Part-145 in many cases do not match type ratings according to Part-66. This leaves much room for interpretation. Therefore Part-66 type names should be harmonized with other regulations for example by referring to those names published in the type certificates.</p> <p>2. Several aircraft types are missing in the list (see table in annex 1):</p> <p>3. The type rating list should be supplemented by a list of Annex II aircrafts. At this time EASA Department “Certification General Aviation” is preparing a list of Annex-II- and Non-Annex-II-aircraft which should be part of the Part-66 Type</p>	<p>Partially accepted</p> <p>1. The definition of type rating and of group ratings are being reworked by the agency through a Rulemaking task, which aims to standardise the definition of type ratings, and should leave less room to interpretation. In the meanwhile, the Appendix I continue to be amended to take the TC holders definition as much as possible as a single definition of aircraft. Commercial designations of aircraft are avoided.</p> <p>2. Introduction of APEX aircraft with Porsche engine is accepted;</p> <p>Bombardier CL 600-2D15 (GE CF34) added in the list in group 1;</p> <p>Correction to Cessna 500/501 (PWC JT15D) carried out;</p>	<p>APEX (Robin) DR 400RP (Porsche)</p> <p>Bombardier CL 600-2D15 (GE CF34)</p> <p>Cessna 501/551 (PWC JT15D)</p>

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			<p>Rating List. Therefore a chapter “14. Aircraft according to Annex II of Commission Regulation 1592/2002” should be added.</p>	<p>Aircraft Raytheon (BAe) 125 Hawker 800/800XP already in Appendix I;</p> <p>Not accepted</p> <p>3. A chapter 14 cannot be added as this would need a prior approval of change in Part-66 § 66.A.45(g).</p> <p>The modification of Annexe II would also require the approval of an Opinion for amending the Basic Regulation 1592/2002.</p> <p>An EASA Rulemaking task is currently on process of simplifying the § 66.A.45(g) with more simple classification of the aircraft.</p>	<p>Raytheon (BAe) 125/Hawker 800/800XP/850XP (Honeywell TFE731)</p>
8.	<p>Draft Decision</p> <p>Type ratings</p>	NL CAA	<p>a. The <u>implementation</u> is not addressed.</p> <p>i. Change of type rating might change the privileges of persons or companies. If this is the case, the effected AML holders should be issued a new AML ensuring that privileges remain unchanged.</p> <p>With NPA 19/2006 this is the case for Embraer 195, which is removed.</p> <p>CAA-NL has not issued any AML with the Embraer ERJ 190/195 (GE CF34).</p> <p>ii. Splitting of type ratings means that the holder of that type rating will get two different type ratings.</p> <p>When do authorities replace the type rating? Immediately or upon extension of the licence? This seems to be the case with the DC-9. Before this NPA the holder of a Part-66 AML with the McD DC-9 (PW JT8D) would also have been considered qualified for the McD DC-9-80 (PW JT8D).</p>	<p>Partially accepted</p> <p>a.</p> <p>i. Refer to answer to comment 7.1. from LBA. In addition, an aircraft variant is added to an existing aircraft type rating when both variants are similar enough so that the training covers both. The additional training if needed shall be requested by the Part-145 authorisation. When the additional variant of the aircraft needs an extensive training, a separate type rating would be included in the list.</p> <p>Embraer 195 is the commercial designation of the Embraer 190-200 which is included in the attached designation in column on right. Commercial designation shall be avoided in the list in the future.</p> <p>ii. It is the privilege of competent authorities to issue the Part-66 licences and to control the</p>	<p>Embraer ERJ-170/190 100/200 (GE CF34)</p>

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			<p>Upon implementation of this NPA he will only be qualified after the McD DC-9-80/MD-88 (PW JT8D-200) is endorsed on his AML</p> <p>CAA-NL will replace the McD DC-9 (PW JT8D) for the McD DC-9-80/MD-88 (PW JT8D-200) and McD DC-9 (PW JT8D), at first opportunity. This will be, when the licence will be reissued for renewal or addition of categories or type ratings. There will not be any additional charge. If the licence holder wishes to add the DC-9-80 or MD-88 immediately, the McD DC-9-80/MD-88 (PW JT8D-200) will be added without any additional proof. Normal charges will apply in this case.</p> <p>b. Detailed comment on individual type ratings – only for group 1, 2 and 11 is given in the table in appendix 2.</p>	<p>management of these licences. In case that a type rating of aircraft has been split into two types by the Agency, the competent authority may endorse the second type on the licence. The Agency is aware that modifying the list in Appendix I creates some difficulties for the management of the licences by the national authorities.</p> <p>b. Answer to Appendix II:</p> <p>Change to ATR is partially accepted. Refer to answer to comment 12 from UK CAA;</p> <p>Change to B 767 accepted;</p> <p>Changes to ER and LR variants of B 777 not accepted as these variants should be part of the basic B 777 course and the 145 organisations shall check the appropriate training of personnel;</p> <p>Convair 540: Not accepted: there is no evidence that Convair 540 with Napier Eland engines are still operated within the EU, thus not listed.</p> <p>Falcon 50 Basic. Not accepted: adding Basic to Falcon 50 is not necessary. The variant 50EX is defined in the TCDS.</p> <p>Dornier aircraft: Partially accepted: a type rating is created when the engines are changed, this is the reason for having the Dornier 328-100 (PWC 119) which shall be different from the Dornier 228 (Honeywell TPE331) Aircraft Dornier 328-300 (PWC 306) is already in the list. Although Dornier is not exactly the designation of the TC holder, the aircraft is known under this name.</p>	<p>ATR 42/72 PEC (PWC 120 Series)</p> <p>Boeing 767-200/300/400ER (GE CF6)</p> <p>Dassault Falcon 50 (Honeywell TFE731)</p> <p>Dornier 328-100 (PWC 119)</p> <p>Dornier 328-300 (PWC 306)</p>

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				<p>Embraer ERJ 195 Accepted: already introduced through its definition ERJ 190, refer to answer to comment 72 from Regional; though there is no action.</p> <p>Lockeed L 328: Not accepted: L-100 is commercial designation for Model 328, and commercial designation are not retained;</p> <p>Fokker: Not accepted: TC designation is F-27 Mark 050; Fokker 50 is the commercial designation, but no change is required. Same for F 70</p> <p>Gulfstream: Partially accepted: TC holder is Gulfstream Aerospace LP, IAI is the manufacturer. Current designation of the aircraft in the list is modified for consistency with TCDS.</p> <p>Gulfstream: Accepted: Designation of Gulfstream (IAI) 200/Galaxy does not use G letter.</p> <p>Gulfstream. Partially accepted: - Gulfstream Model G-159 commercial designation is Gulfstream I. Current designation of the aircraft in the list is modified for consistency with TCDS</p> <p>Gulfstream G-1159: Partially accepted as previous item: G-1159 is the designation in TC. Current designation of the aircraft in the list is modified for consistency with TCDS</p> <p>Lockeed L-100; Not accepted: L-100 is commercial designation for Lockheed 382.</p> <p>DC-3: Accepted;</p>	<p>Embraer ERJ-170/190 100/200 (GE CF34)</p> <p>Gulfstream (IAI) G150 (Honeywell TFE731)</p> <p>Gulfstream (IAI) G200/Galaxy (PWC 306)</p> <p>Gulfstream G159 (RRD Dart)</p> <p>Gulfstream GH & GHI G-1159 Series (RRD Spey)</p> <p>McD DC3 (PW R1830)</p>

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				<p>DC-9 aircraft: Accepted: Although the MD-80 is a DC-9 Series 80 initially, the designation of DC-9 Series and MD-80 Series shall remain as simple as possible.</p> <p>SD3-Sherpa: partially accepted, but commercial designation are avoided;</p> <p>Bombardier Accepted: Bombardier DHC-6 (PWC PT6) removed from group 2; and replaced with: Viking Air aircraft DHC-6 modified with (De Havilland);</p> <p>Cessna accepted: Cessna/Reims F 406 (PWC PT6) corrected to read as shown in next column; and Reims aircraft corrected as Reims is TC owner.</p> <p>Raytheon: Accepted: Designation of Raytheon (Beech) 100 Series (PWC PT6) within Raytheon (Beech) 99 clarified;</p> <p>Accepted: Designation of Vulcanair AP.68TP Series (RR Corp 250) in group 2 has been clarified;</p> <p>Accepted: Agusta A 109 is corrected to read A109;</p> <p>Accepted: Designation of Boeing 234 has been corrected;</p> <p>Not accepted: Eurocopter AS 332 C1 is a civil <u>and</u> a military version. TCDS include all series. Modification in the Decision is for consistency with TCDS.</p>	<p>McD DC-9 (PW JT8D) McD MD-80 Series (PW JT8D)</p> <p>Shorts SD3-30/SD3-60 (PWC PT6)</p> <p>Bombardier DHC-6 (PWC PT6) Viking Air (De Havilland) DHC-6 (PWC PT6)</p> <p>Cessna/Reims F 406 (PWC PT6) and Reims F406 (PWC PT6)</p> <p>Raytheon (Beech) 100 Series (PWC PT6) Raytheon (Beech) 99/100 (PWC PT6) Viking Air (De Havilland) DHC-6 (PWC PT6)</p> <p>Vulcanair AP.68TP Series (RR Corp 250)</p> <p>Agusta A109 Series (PWC 206/207) etc,</p> <p>Boeing 234 (Honeywell 5512)</p> <p>Eurocopter AS 332C/C1/L/L1 (Turbomeca Makila 1A)</p>

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				<p>Accepted: Eurocopter MBB-BK 117 A/B (Honeywell LTS 101) and MBB-BK 117 C1 and C2 (Turbomeca Arriel 1) are in group 11.</p>	<p>Eurocopter MBB-BK 117 A/B (Honeywell LTS 101) Eurocopter MBB-BK 117 C1, C2 (Turbomeca Arriel 1)</p>
9.	Appendix 1 2. 3.	NL CAA	<p>Piaggio P.180 Avanti/Avanti II (PWC PT6)</p> <p>a. In Group three the Piaggio P180 (PWC PT6) is deleted with decision 2006/6/R.</p> <p>b. In Group two there is the Piaggio P180 Avanti.</p> <p>c. The EASA Type certificates certifies two models, type ratings should be in line with the TCDS.</p> <p>i. Piaggio P.180 Avanti ii. Piaggio P.180 Avanti II</p> <p>d. It is not clear from the type rating alone whether both models are covered by this type rating.</p> <p>e. Implementation of the change with Decision 2006/6/R implies that a holder of the old Piaggio P-180 (PWC PT6) now his AML will include the Piaggio P180 Avanti II (PWC PT6) with the electronic flight deck.</p> <p>f. Does the incorporation of Piaggio Modification No. DMT 80-0587, that includes an Electronic Flight Instrument System with an Integrated Avionics processor System – Rockwell Collins Pro Line 21, require separate type training for B1 and B2? Then a separate type rating would be useful to control this.</p>	<p>Partially accepted</p> <p>Cancellation of Piaggio P180 from Group 3 has been made as the same aircraft was already in Group 2, which is its normal place.</p> <p>As the Piaggio P180 Avanti II differentiates from the Piaggio Avanti with the installation of the Collins Pro Line system, both aircraft variants are grouped in a type.</p> <p>The list shall be amended to reflect any new variants. Refer to answer to comment 8 to the NL CAA.</p>	<p>Piaggio P180 Avanti/Avanti II (PWC PT6)</p>
10.	Appendix 1 1.Large Aircraft	UK CAA	<p>Delete Airbus A300 B2/B4 (PW 400).</p> <p>Justification: No TCDS. Engine type applies to A300-600 model only.</p>	<p>Accepted</p>	<p>Airbus A300 B2/B4 (PW 4000)</p>

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11.	Appendix 1 1.Large Aircraft	UK CAA	Delete Airbus A300 B2/B4 (PW JT9D). Justification: No TCDS. Engine type applies to A300-600 model only.	Not accepted This aircraft has been fitted with JT9D engines.	
12.	Appendix 1 1.Large Aircraft	UK CAA	Amend Airbus UK (BAC) One-Eleven (RRD Spey) to read Airbus UK (BAC) 1-11 (RR Spey) Justification: Correction to correct nomenclature for airframe and corrected division of Rolls Royce engine.	Partially accepted Designation 1-11 is accepted, but RR SPEY engines remain within RR Deutschland and RRD is TC holder.	Airbus UK (BAC) 1-11 (RRD Spey)
13.	Appendix 1 1.Large Aircraft	UK CAA	Delete current three entries for ATR 42/72 and replace with single entry ATR 42/72 (PWC 120). Justification: The PEC element which differentiates the current three entries means Propeller Electronic Control and should be included in ALL type training to meet the requirements of Part-66 Appendix III, therefore no requirement for different aircraft types. Any differentiation for certification should be restricted to the Part-145 authorisation process.	Accepted However PW 120 Series is added for the series of engines installed on these aircraft.	ATR 42/72 PEC (PWC 120 Series)
14.	Appendix 1 1.Large Aircraft	UK CAA	Amend all BAe entries (5 off) to read BAe Justification: Correct nomenclature for company.	Partially accepted This is accepted for the BAe 146 aircraft for the designation of the aircraft only, but as the TC holder is BAE Systems, BAE Systems shall be stated to each aircraft	BAE Systems BAe 146/RJ (Honeywell ALF500 Series), but: BAE Systems HS748 (RRD Dart)
15.	Appendix 1 1.Large Aircraft	UK CAA	Amend Boeing 767-200/300 (RR RB211) to read Boeing 767-300 (RR RB211) Justification: RR RB211 engine not certificated for fitment to B767-200.	Accepted	Boeing 767- 200 /300 (RR RB211)
16.	Appendix 1 1.Large Aircraft	UK CAA	Delete entry for Boeing 767-400ER(GE CF6). Justification: Same TCDS as Boeing 767-200/300. TCDS No A1NM.	Partially accepted We include the variant 400ER within the 200/300 variant as requested, they are in the same TC. Training on B767 would include all variants, and the 145 authorisation would ensure that the	Boeing 767-200/300/400ER (GE CF6)

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				adequate training has been provided before issuing the authorisation. Other aircraft type ratings may be modified accordingly in the future.	
17.	Appendix 1 1.Large Aircraft	UK CAA	Amend Boeing 767-200/300 (GE CF6) to read Boeing 767-200/300/400 (GE CF6) Justification: Common TCDS see entry above.	Accepted Refer to comment 16 here above.	
18.	Appendix 1 1.Large Aircraft	UK CAA	Amend CASA C-12 (Honeywell TPE331) to read CASA C-212 (Honeywell TPE331) Justification: Correct name as per TCDS A43EU.	Accepted Already decided by the Agency previously.	Casa C-212 (Honeywell TPE331)
19.	Appendix 1 1.Large Aircraft	UK CAA	Amend Boeing 727 (RRD Tay) to read Boeing 727 (RR Tay) Justification: Correct Rolls Royce engine division.	Not accepted RR Tay engines remain within RR Deutschland and RRD is TC holder.	
20.	Appendix 1 1.Large Aircraft	UK CAA	Amend Kelowna (Convair) 600/640 (RRD Dart) to read ... (RR Dart) Justification: Correct Rolls Royce engine division.	Not accepted RR DART engines remain within RR Deutschland and RRD is TC holder. Modification in the Decision is for consistency with TCDS.	Kelowna (Convair) 600/640 (RRD Dart)
21.	Appendix 1 1.Large Aircraft	UK CAA	Combine entries for Dassault Falcon 50B and 50Ex to read Dassault Falcon 50B/50EX (Honeywell TFE731). Justification: Insufficient differences between variants to warrant separate type ratings and approved type training courses.	Not accepted This definition of type ratings has been provided by Dassault. When the Opinion of the Agency to decide that aircraft having few differences in the training would be adopted, such change would be made. Refer to answer to comment 7 from the LBA.	

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22.	Appendix 1 1.Large Aircraft	UK CAA	Combine Dassault Falcon 900B, 900C and 900EX to read Dassault Falcon 900B/900C/900EX (Honeywell TFE731). Justification: Insufficient differences between variants to warrant separate type ratings and approved type training.	Not accepted Refer to answer to comment 21.	
23.	Appendix 1 1.Large Aircraft	UK CAA	Amend Embraer ERJ-190 (GE CF34) to read Embraer ERJ-190 100/200 (GE CF34) Justification: Align description with Embraer ERJ 170 model.	Partially accepted Refer to answer to comment 83 from Regional. All the variants of an aircraft are not specified in its designation.	Embraer ERJ-170/190 400/200 (GE CF34)
24.	Appendix 1 1.Large Aircraft	UK CAA	All references to Rolls Royce engines in the Fokker series of aircraft should read RR and NOT RRD. Justification: Correct Rolls Royce engine division	Not accepted RR DART on Fokker aircraft engines remain within RR Deutschland and RRD is TC holder.	
25.	Appendix 1 1.Large Aircraft	UK CAA	Remove (Gates) from all Learjet entries (8 off). Justification: Learjet are TCDS holder.	Partially accepted Gates remains in bracket, as when the original manufacturer name remains well-known, the name is kept; the same is done for Raytheon (Beech). Refer to answer to comment 7 from the LBA.	(Gates) Learjet 31 (Honeywell TFE731)
26.	Appendix 1 1.Large Aircraft	UK CAA	Delete Learjet 24 and Learjet 25 and combine to read Learjet 24/25 GE CJ610). Justification: Insufficient differences between aircraft to warrant separate type ratings and approved type training.	Accepted	(Gates) Learjet 24 (GE CJ610) (Gates) Learjet 24/25 (GE CJ610)
27.	Appendix 1 1.Large Aircraft	UK CAA	Delete Learjet 35 and Learjet 36 and combine to read Learjet 35/36 (Honeywell TFE731). Justification: Insufficient differences between aircraft to warrant separate type ratings and approved type training.	Accepted	(Gates) Learjet 35 (Honeywell TFE731) (Gates) Learjet 35/36 (Honeywell TFE731)

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28.	Appendix 1 1.Large Aircraft	UK CAA	The Rolls Royce Dart, Spey and Tay engines associated with the Gulfstream aircraft should be amended to read (RR Dart) (RR Spey) (RR Tay). Those engines identified as (RRD BR710) are correct. Justification: Identified to correct Rolls Royce division.	Not accepted RR DART, SPEY and TAY on Gulfstream aircraft engines remain within RR Deutschland and RRD is TC holder.	
29.	Appendix 1 1.Large Aircraft	UK CAA	There are aircraft such as the McD DC-3 (PW R1830) that could be considered candidates for Annex II. Why has the Lockheed L100 (RR Corp 501) been removed?	Not accepted MDD has still a TC for the DC3, and such aircraft shall not be currently considered as Annex II aircraft.	
30.	Appendix 1 1.Large Aircraft	UK CAA	Delete McD DC-9-80/MD-88 (PW JT8D-200). Justification: Same aircraft as McD MD80 Series (PW JT8D).	Not accepted The McD DC-9-80/MD-88 (PW JT8D-200) aircraft is significantly different from the DC-9-80 (MD80 being the commercial designation).	McD DC-9-80/MD-88 (PW JT8D-200)
31.	Appendix 1 1.Large Aircraft	UK CAA	Delete McD MD-10 Series (GE CF6). Justification: Same aircraft as McD DC-10.	Accepted	McD DC-10/MD-10 (GE CF6)
32.	Appendix 1 1.Large Aircraft	UK CAA	Add Mitsubishi MU300 (PW JT15) Justification: Aircraft has own TCDS No A14SW.	Not accepted The MU300 has its TCDS A14SW from Mitsubishi, but has then been manufactured by Raytheon as a Beech 400 under TCDS A16SW, therefore both aircraft are combined.	Raytheon (Beech) 400 / Mitsubishi MU-300 (PWC JT15)
33.	Appendix 1 1.Large Aircraft	UK CAA	Amend Raytheon (Beech) 400/Mitsubishi MU-300 (PWC JT15) to read Raytheon (Beech) 400 (PW JT15) Justification: See entry above MU-300 has own TCDS and PW engine is PW (USA) not PW Canada.	Not accepted Refer to answer to comment 32 from UK CAA The JT15D engine is owned by PW Canada who holds the TC E25EA.	

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
34.	Appendix 1 1.Large Aircraft	UK CAA	Add PZL M28 (PWC PT6) Delete this type from section 3 Justification: Aircraft above 5700kg.	Accepted Aircraft moved to group 1.	PZL M 28 (PWC PT6)
35.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Cessna 337 (pressurised) (Continental) Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 7 from LBA. In addition the definition of a complex aircraft is part of this Rulemaking process. Until such time the Opinion is approved, we do not have a regulatory requirement for classifying all pressurised aircraft as complex. The pressurisation of non large aircraft is not currently considered as a system which classifies automatically an aircraft as being complex.	
36.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Amend Cessna 500 (PWC JT15D) to read Cessna 500 (PW JT15D) Justification: JT15D engine is from USA division of Pratt and Whitney.	Not accepted The JT15D engine is owned by PW Canada who holds the TC E25EA.	
37.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Cessna P210 (Continental) Justification: Pressurised aircraft considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
38.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Extra EA 400 (Continental) Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
39.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Amend (Gates) Learjet 23 to read Learjet 23 (GE CJ610) Justification: Learjet are TCDS holder.	Not accepted Refer to answer to comment 25 from the UK CAA.	

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
40.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Mitsubishi MU-2B (Honeywell TPE331) Justification: Pressurised airframe with an unusual flight control system.	Accepted Transfer to group 2 accepted due to specific flight controls and complexity of the airframe.	Mitsubishi MU-2B (Honeywell TPE331)
41.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Piper PA-31P (Lycoming) Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
42.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Twin Commander 600/700 (Lycoming) Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
43.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Delete PZL M 28 (PWC PT6). Justification: Moved to Section 1 aircraft above 5700kg.	Accepted Aircraft removed from group 3 and added to group 1.	PZL M 28 (PWC PT6)
44.	Appendix 1 2. Aeroplanes of 5700kg and below	UK CAA	Add Raytheon (Beech) 58P (Continental) Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
45.	Appendix 1 3. Aeroplanes multiple turbine engines.	UK CAA	Delete Mitsubishi MU-2B (Honeywell TPE331). Justification: Moved to Section 2.	Accepted Result of comment 40	
46.	Appendix 1 4. Aeroplane single turbine engine	UK CAA	Delete Aermacchi (RR Corp 250). Justification: Military aircraft.	Not accepted Aermacchi aircraft type more detailed in group 4 and 6.	Aermacchi SF260TP (RR Corp 250) added in group 4, and Aermacchi SF260 Series (Lycoming) modified in group 6.

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
47.	Appendix 1 4. Aeroplane single turbine engine	UK CAA	Delete Grob G 520 (Honeywell TPE331). Justification: Pressurised airframe considered complex, move to section 2.	Not accepted Refer to answer to comment 35 from UK CAA.	
48.	Appendix 1 4. Aeroplane single turbine engine	UK CAA	Add Maule MX-7 (RR Corp 250) Justification: Moved from section 6. (Piston Engine) This A/C gas turbine powered.	Accepted Aircraft added in group 4.	Maule MX-7 (RR Corp 250)
49.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Delete Aero Commander AC 50. (Lycoming) Justification: Same aircraft as Twin Commander (Gulfstream/Rockwell/ Aerocommander) 500 series.	Accepted	Aero Commander AC 50 (Lycoming)
50.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Amend Cessna 337 to read Cessna 337 (unpressurised) (Continental) Justification: Differentiate from the pressurised version listed in section 2	Accepted The pressurised version is added in group 2, And the non pressurised version is specified in group 5 as being non pressurised.	Cessna P337 (Continental) added in Group 2, and in group 5: Cessna 337 (Continental) (not pressurised)
51.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Delete Piper PA-31P (Lycoming). Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
52.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Delete Raytheon (Beech) 58P (Continental). Justification: Pressurised airframe considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
53.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Add Republic UC1 (Twinbee) (Lycoming) Justification: Recognised aircraft type.	Accepted	Republic UC1 (Lycoming)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
54.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Comment: Delete RR from Piper PA-34 (RR Continental). Proposed text: Piper PA-34 (Continental) Justification: Continental engine is not made by Rolls Royce.	Accepted	Piper PA-34 (RR Continental)
55.	Appendix 1 5. Aeroplane multiple piston engines	UK CAA	Comment: Delete “Rockwell” from twin Commander. Proposed text: Twin Commander (Gulfstream/Rockwell/Aerocommander) 685 (Continental). Justification: Rockwell used twice in definition	Accepted This had been decided already.	Twin Commander (Gulfstream/Rockwell/ Aerocommander) 685 (Continental) Twin Commander (Gulfstream/Rockwell/ Aerocommander) 500 Series/680 Series (Lycoming)
56.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Comment: Delete “Alpha” from Apex (Robin) HR200. Proposed text: Apex (Robin) HR200/R2000 series (Lycoming) Justification: Align with other Apex (Robin) aircraft.	Not accepted All aircraft changed to APEX except HR200 which TC is transferred to Alpha Aviation, New Zealand. The final text in the decision id for consistency with TCDS.	Alpha Apex Aircraft (APEX/Robin) HR 200/ R 2000 series (Lycoming)
57.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Comment: Delete “P210” from Cessna 210 series. Proposed: Cessna 210 series (Continental) Justification: Pressurised aircraft considered complex.	Not accepted Refer to answer to comment 35 from UK CAA.	
58.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Add Maule M5 (Continental) Justification: Included on TCDS 3A23.	Accepted	M5 (Continental)
59.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Delete Maule MX-7 (RR Corp 250). Justification: Gas turbine powered aircraft listed in incorrect section.	Accepted	

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
60.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Amend Mooney M20(Lycoming) to read M20B to M20S (Lycoming) Justification: Mooney M20 and M20A are Wooden constructed aircraft and should be listed in section 8.	Accepted	Mooney M20/M20A (Lycoming) in group 1.8.
61.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Amend Mooney M20(Continental) to read M20B to M20S (Continental) Justification: Mooney M20 and M20A are Wooden constructed aircraft and should be listed in section 8.	Accepted	In group 1.6: Mooney M20B to M20S (Lycoming).
62.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Delete Piper PA-46 (Continental) & (Lycoming). Justification: Aircraft pressurised listed in Section 2.	Not accepted Refer to answer to comment 35 from UK CAA.	
63.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Add PZL-104 Wilga (Lycoming) Justification: Existing aircraft/engine combination not included in table.	Accepted Aircraft added in group 6	PZL-104 (Lycoming)
64.	Appendix 1 6. Aeroplane single piston engine	UK CAA	COMMENT: Amend Sky Enterprise RC-3 (Lycoming) with (Franklin) engine. PROPOSED TEXT: Sky Enterprise (Republic) RC-3 (Franklin) Justification: TCDS A-769 certifies aircraft with Franklin engine not Lycoming.	Accepted	Sky Enterprises (Republic) RC-3 (Franklin)
65.	Appendix 1 6. Aeroplane single piston engine	UK CAA	COMMENT: Combine SIAI Marchetti S205 and S208. PROPOSED TEXT: SIAI-Marchetti S205/S208 (Lycoming) Justification: Same TCDS.	Accepted	SIAI-Marchetti S.205/S.208 (Lycoming), and : SIAI Marchetti S.208 (Lycoming)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
66.	Appendix 1 6. Aeroplane single piston engine	UK CAA	Add SIAI-Marchetti S205 (Franklin) Justification: Existing aircraft /engine combination.	Accepted	SIAI-Marchetti S205 (Franklin)
67.	Appendix 1 6. Aeroplane single piston engine	UK CAA	COMMENT: Amend Tecnam P2002 (Rotax) to include P96. PROPOSED TEXT: Tecnam P96/P2002 (Rotax) Justification: Existing aircraft.	Accepted	Tecnam P96/P2002 (Rotax)
68.	Appendix 1 8. Aeroplane single piston (wooden structure)	UK CAA	Amend Bolkow (Klemm) KL.207(Continental) to read F.207(Lycoming) Justification: KL207 should read K1.107 (Continental) possibly existing in Germany. F.207 (Lycoming) on UK register. Bolkow (Klemm) F.207 (Lycoming).	Accepted Aircraft modified as shown.	Bölkow (Klemm) K1.107/F.207 (Continental) Bölkow F.207(Lycoming)
69.	Appendix 1 8. Aeroplane single piston (wooden structure)	UK CAA	Delete Partenavia P64 and P66. Justification: Aircraft types are metal structure.	Accepted Aircraft moved from group 8 to group 6.	Partenavia P.64 (Lycoming) Partenavia P.66 (Lycoming)
70.	Appendix 1 6. Aeroplane single piston (wooden structure)	UK CAA	Add Partenavia P64 (Lycoming) and P66 (Lycoming) Justification: Transferred from section 8 as aircraft are metal structure.	Accepted Aircraft added in group 6.	Partenavia P.64 (Lycoming) Partenavia P.66 (Lycoming)
71.	Appendix 1 8. Aeroplane single piston (wooden structure)	UK CAA	Add Diamond DV22 (Rotax) Justification: Existing type.	Accepted Added in group 8.	Diamond DV22 (Rotax)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
72.	Appendix 1 10. Aeroplane single piston engine – composite structure	UK CAA	Delete Extra EA-400. Justification: Pressurised airframe considered complex. Moved to Section 2.	Not accepted Refer to answer to comment 35 from UK CAA.	
73.	Appendix 1 10. Aeroplane single piston engine – composite structure	UK CAA	Amend III Sky Arrow to read 3i Sky Arrow 650/710 (Rotax) Justification: Incorrect nomenclature.	Accepted The TC holder is Iniziative Industriali Italiane S.p.A, which shall read preferably III than 3i.	III Sky Arrow 650/710 (Rotax)
74.	Appendix 1 10. Aeroplane single piston engine – composite structure	UK CAA	Amend Slingsby T67B/T67C/767M Series to read as below: Slingsby T67B/T67C/T67M Series (Lycoming) Justification: Typographical error.	Accepted 767M has be corrected to 76M	Slingsby T67B/T67C/T67M series (Lycoming)
75.	Appendix 1 11. Multi- engine helicopters	UK CAA	Delete AS332C/C1 from Eurocopter AS332L/L1. Justification: The AS332C/C1 is a military specification helicopter and should not be eligible for certification on civil register. Eurocopter AS332L/L1 (Turbomeca Makila 1A).	Not accepted AS332C and C1 are military but also civil helicopters.	
76.	Appendix 1 12. Helicopters Single turbine engine	UK CAA	Delete Eurocopter SE313B (Turbomeca Artouste). Justification: Military Specification helicopter.	Not accepted SE313 helicopter is a civil aircraft and has a TC.	
77.	Appendix 1 12. Helicopters Single turbine engine	UK CAA	Delete SEI (Breda-Nardi) NH-300 and move to section 13. Justification: This is a piston engine powered helicopter.	Accepted This change was carried out in group 13 prior to the UKCAA request.	SEI (Breda-Nardi) NH-300 Series (Lycoming)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
78.	Appendix 1 12. Helicopters Single turbine engine	UK CAA	COMMENT: Delete 600N from MD Helicopters(Hughes) 369 series/50N. PROPOSED TEXT: MD (Hughes) 369series/500N (RR Corp 250) Justification: MD 600N is a NOTAR type helicopter whereas the 369 series has a conventional tail rotor.	Accepted Either all three helicopters are in the same TC, the NOTAR system on 500N model seems a significant change for maintenance purpose.	MD Helicopters (Hughes) 369 series (RR Corp 250)
79.	Appendix 1 12. Helicopters Single turbine engine	UK CAA	COMMENT: Re-instate MD 600N (RR Corp 250). PROPOSED TEXT: MD 600N (RR Corp 250) Justification: NOTAR type helicopter significantly different from 369 series.	Accepted MD500 and MD600 were already separated from the 369 model.	MD 500N (RR Corp 250) MD 600N (RR Corp 250)
80.	Appendix 1 12. Helicopters Single turbine engine	UK CAA	COMMENT: Re-instate MD520N (RR Corp 250) PROPOSED TEXT: MD 520N (RR Corp 250) Justification: NOTAR type helicopter significantly different from 369 series.	Accepted	MD 500N (RR Corp 250)
81.	Appendix 1 13. Helicopters Single piston engine	UK CAA	Delete “Agusta” and” Westland” from Bell 47 (Franklin). Justification: Agusta and Westland versions of this aircraft not certificated for fitment of Franklin engine. Agusta 47 (Franklin)	Accepted The Bell 47 helicopter fitted with the Franklin engine has been modified.	Bell Agusta/Westland 47 (Franklin)
82.	General comment	FAA	The FAA has reviewed the subject NPA and has no comments.	Noted	
83.	Appendix 1 1. Large aircraft <i>Page 8 of 15</i>	Régional	We allow ourselves to subject a remark concerning the items Embraer 190 and Embraer 170. We would like to see gathering these two planes in a same family and thus to transform the two appellations into a single EMBRAER 170-175/190-195 for the following reasons: - Several European airline companies are directed	Accepted The technical differences between the 4 variants 170-100/200 and 190-100/200 are not critical in terms of maintenance, which assumes that they are similar enough to group them in one type rating.	Embraer ERJ-170/190 100/200 (GE CF34)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
			<p>towards the introduction of the two types of plane.</p> <ul style="list-style-type: none"> - Technologies and philosophy of the systems of these two machines are quite similar. - Technical documentations are organized exactly in the same way. - The policies of maintenance can be common. - This concept of family already exist for the Flight crew technical qualifications. - The two types, joined together in a same family, would allow the maintenance organizations an optimization of employment of the technicians holders of the single licence EMBRAER 170/190 - The qualification of the E170/190 type would need only a complement of a few days (5) more than the existing QT (study of the differences) to satisfy the requirements of the programs PART 66 		
84.	General comment	JAA	The JAA non-EASA member states did not send any comments on NPA 19 2006 to the Focal Point of Airworthiness.	Noted	
85.	Draft decision Type ratings	CAA SE	<p>The Swedish CAA suggests that “BAE 146/RJ (Honeywell ALF500 Series)” should be divided into two different types.</p> <p>The Swedish CAA has also made suggestions for the amendment of Appendix I continuously all through its existence, so we have no further proposals for the amendment at this moment.</p> <p>Although in this context, we wish to take the opportunity to point out the difficulties to update the licences in the rate of which the designations in Appendix I are amended. These frequent amendments lead to not having uniform type designations between the member states. It is</p>	<p>Partially accepted</p> <p>There are according to the UK CAA not any significant changes between the BAE Systems BAe 146 and BAE RJ Regional Jet which mandate separating the Type Ratings.</p> <p>Refer to answer to comment 8. a.ii of NL CAA regarding the difficulties in managing the licences.</p>	BAE Systems BAe 146/RJ (Honeywell ALF500 Series)

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Cmt #	Para	Comment provider	Comment/Justification	Response	Resulting text
			<p>difficult even within one member state, since it is depending on when a specific licence is issued or amended, what the designation will be.</p> <p>Following this we are considering “freezing” our licence system to one specific issue of Appendix I, and not updating it until a more permanent issue of the list will be published.</p> <p>The Swedish CAA will also through its representative in AGNA bring out the question whether this is an acceptable method or not.</p>		

Appendix 1 to Comment 7

proposed text	add to chapter	Reference
APEX Aircraft (Robin) DR 400RP (Porsche)	8 (ASPE-WS)	TC No. 1001 (LBA)
Bombardier CL 600-2D15 (GE CF34)	1 (LA)	TC No. IM.A.023
Cessna 500/501 (PWC JT15D)	2 (A-tr)	
Raytheon (BAe) 125 Hawker 800/800XP	1 (LA)	TC No. IM.A.085

Appendix 2 to Comment 8

Detailed comment for group 1, 2 and 11 only as follows:

Yellow: changes proposed.	Comment and questions to group 1 and 2 only.	Proposed text
ATR 42/72 PEC (PWC 120)	The essence of the addition of 'PEC' for Propeller Electronic Control is not clear. This term is not mentioned in the TCDS. Also the engine may vary between PWC 120/121/124 and 127.	ATR 42/72 (PWC 120/121/124/127) (For all model and variants)
Boeing 767-400ER GE CF6)	Add space & bracket	Boeing 767-400ER (GE CF6)
Boeing 777-200/300 (GE 90)	Propose to add Boeing 777-200/(200ER)/200LR/300ER (GE 90) (200ER) between bracket because it is no formal model in TCDS, but still used in documentation etc for models used by KLM. Boeing uses customer codes like xx6 for KLM this means that '200-series' might be more accurate.	Boeing 777-200/(200ER)/200LR/300ER (GE 90)
Kelowna (Convair) 580 (RR Corp 501)	If Convair 540 designation is for conversion with Napier Eland engines, is this reason to add additional type rating for 540?	Kelowna (Convair) 580 (RR Corp 501)
Dassault Falcon 50 (Honeywell TFE731)	It is not clear for a licence with Falcon 50 that this does not include 50EX. 50B and 50EX are not an existing models. "(Basic)" would be better than "B" because Falcon 50 is not the same as 50B; which is no formal model designation Suggest to change or combine.	Dassault Falcon 50(Basic) (Honeywell TFE731)
Dornier 328-100 (PWC 119)	Dornier not TC holder? What is the use of -100?	Dornier 328-100 (PWC 119)
Dornier 328-300 (PWC 306)	Dornier not TC holder? What is the use of -300?	Dornier 328-300 (PWC 306)
Embraer ERJ-190 (GE CF34)	What action is required in relation to ERJ-195 in case type rating ERJ 190/195 has been issued?	Embraer ERJ-190 (GE CF34)
Fokker F50 (PWC 125/127)	Delete F in F50	Fokker 50 (PWC 125/127)
Fokker F70/100 (RRD Tay)	Delete F in F70	Fokker 70/100 (RRD Tay)
Gulfstream IAI G100/Astra SPX (Honeywell TFE731)	Not clear what relation is between Gulfstream Aerospace LP and Israel Aircraft Industries. Seems not consistent. If "IAI" is now TC holder than Gulfstream should be in brackets. In FAA TCDS Gulfstream 100 is model name (not G100)	Gulfstream IAI 100/Astra SPX (Honeywell TFE731)
Gulfstream G150 (Honeywell TFE731)	Why is "IAI" not mentioned here, as it is with Gulfstream 100. (G150 here correct)	Gulfstream G150 (Honeywell TFE731)
Gulfstream IAI G200/Galaxy (PWC 306)	remove G in G200 see TCDS	Gulfstream IAI 200/Galaxy (PWC 306)
Gulfstream G-159 (RRD Dart)	Gulfstream Aerospace Corporation not same TC holder as Gulfstream Aerospace LP. Designation Gulfstream I or G-159	Gulfstream I/G-159 (RRD Dart)

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Yellow: changes proposed.	Comment and questions to group 1 and 2 only.	Proposed text
Gulfstream G-1159(RRD Spey)	More model designations possible: I. - Model G-1159, Gulfstream II (Rolls Royce Spey RB (163) 511-8) II. - Model G-1159, Gulfstream II (Rolls Royce Spey RB (163-25) 511-8) III. - Model G-1159A, Gulfstream III (Rolls Royce Spey RB (163-25) 511-8) IV. - Model G-1159B, Gulfstream G-IIB (Rolls Royce Spey RB (163-25) 511-8)	Gulfstream II/G-IIB/III/G-1159 (RRD Spey)
Lockheed 382 (RR Corp 501)	Propose top add (L-100) to Lockheed 382 because it is not a formal model	Lockheed 382/(L-100) (RR Corp 501)
McD DC-3 (PW R1830)	DC3 without hyphen; see TCDS	McD DC3 (PW R1830)
McD DC-9-80/MD-88 (PW JT8D-200)	The DC-9-80 is added. Formerly the other DC-9 type rating would have been required. How should this be dealt with? E.G. issue this type rating to all people having the McD DC-9 (PW JT8D)? This is the only place where extension - 200 is added to JT8D; suggest to leave it out. The old type rating will be confusing after this combined rating is added. McD DC-9 (PW JT8D) does not longer cover the McD DC-9-80 (PW JT8D); this is not clear.	Possible solution is to have one rating: McD DC-9/MD-88 (PW JT8D) For all DC-9 and MD88's
Shorts SD3-30/SD3-60 (PWC PT6)	Should SD3-SHERPA (and SD3-60 SHERPA) be added?	Shorts SD3-30/SD3-60 (PWC PT6)
Bombardier DHC-6 (PWC PT6)	Delete: Viking Air TC holder	
Viking Air DHC-6 (PWC PT6)	Suggest to add (De Havilland) see also DHC-7	Viking Air (De Havilland) DHC-6 (PWC PT6)
Cessna/Reims F406 (PWC PT6)	Cessna does not use F in F406; Better Cessna 406 / Reims F406 (PWC PT6)	Cessna 406/Reims F406 (PWC PT6)
Reims F406 (PWC PT6)	Included in Cessna 406/Reims F406 (PWC PT6)	
Raytheon (Beech) 100 Series (PWC PT6)	Included in 99/100 series	
Vulcanair AP.68TP Series (RR corp 250)	Group 5 or group 2? AP68 TP instead of AP.68TP	Vulcanair AP68 TP Series (RR corp 250)
Agusta A 109 (Turbomeca Arriel 1)	remove space in A 109	Agusta A109 (Turbomeca Arriel 1)
Agusta A 109 Series (PWC 206/207)	remove space in A 109	Agusta A109 Series (PWC 206/207)
Agusta A 109 Series (RR Corp 250)	remove space in A 109	Agusta A109 Series (RR Corp 250)
Agusta A 109 Series (Turbomeca Arrius 2)	remove space in A 109	Agusta A109 Series (Turbomeca Arrius 2)
Boeing BV234 (Honeywell 5512)	Remove "BV"	Boeing 234 (Honeywell 5512)
Eurocopter AS 332C/C1/L/L1 (Turbomeca Makila 1A)	Remove C1	Eurocopter AS 332C/L/L1 (Turbomeca Makila 1A)
Eurocopter MBB-BK 117 (Turbomeca Arriel 1)	Implementation not specified	Eurocopter MBB-BK 117 (Turbomeca Arriel 1)
Eurocopter MBB-BK 117 C2 (Turbomeca Arriel 1)	Implementation not specified	Eurocopter MBB-BK 117 C2 (Turbomeca Arriel 1)