COMMENT RESPONSE DOCUMENT (CRD) TO NOTICE OF PROPOSED AMENDMENT (NPA) 2011-07

amending the Executive Director Decision No 2003/19/RM of 28 November 2003 on Acceptable Means of Compliance and Guidance Material to Commission Regulation (EC) No 2042/2003 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 1 Aircraft type ratings for Part-66 aircraft maintenance licence

I. General

1. The purpose of the Notice of Proposed Amendment (NPA) 2011-07, dated 05 May 2011 was to propose an amendment to Decision of the Executive Director of the Agency No 2003/19/RM of 28 November 2003[1].

   The corresponding rulemaking task is RMT.0091 (66.026) and is an Agency's task.

   This NPA proposed the introduction of:

   - Aircraft certified in accordance with Regulation (EC) No 1702/2003 of 24 September 2003[2],
   - Corrections to aircraft not certified in accordance with Regulation (EC) No 1702/2003,
   - Change in TC holder designations.

II. Consultation

2. The NPA 2011-07[3] was published on the web site on 5 May 2011.

   By the closing date of 5 August 2011, the European Aviation Safety Agency ("the Agency") had received 18 comments from 15 National Aviation Authorities, professional organisations and private companies.

III. Publication of the CRD

3. All comments received have been acknowledged and incorporated into this Comment Response Document (CRD) with the responses of the Agency.

4. In responding to comments, a standard terminology has been applied to attest the Agency'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 or proposed amendment is not shared by the Agency

   The resulting text highlights the changes as compared to the current rule.

5. The Executive Director Decision on the Acceptable Means of Compliance and Guidance Material (AMC/GM) to Commission Regulation (EC) No. 2042/2003 of 20 November 2003 Annex III (Part-66) will be issued at least one month after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.

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[1] Decision No 2003/19/RM of the Executive Director of the European Aviation Safety 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 an personnel involved in these tasks. Decision as last amended by Decision 2011/003/R of 10 May 2011.

[2] Commission Regulation (EC) 1702/2003 of 24 September 2003 laying down implementing rules for the airworthiness and environmental certification of aircraft and related products, parts and appliances, as well as for the certification of design and production (OJ L 243, 27.9.2003, p. 6). Regulation as last amended by Commission Regulation (EC) 1194/2009 of 30 November 2009 ((OJ L 321, 8.12.2009, p. 5).

[3] See: http://easa.europa.eu/rulemaking/docs/npa/2011/NPA%202011-07.pdf

6. Such reactions should be received by the Agency not later than **17 October 2011** and should be submitted using the Comment-Response Tool at http://hub.easa.europa.eu/crt.

NOTE:

The Agency would like to note that the Executive Director Decision to be published following this CRD will still contain the list of type ratings in the current format (13 aircraft groups), not taking into consideration the new aircraft groups (3 groups) that will be part of the new Part-66 rule that is expected to be adopted by the Commission before the end of this year (currently in comitology process in the Parliament and Council).

The reason for this is that the new Part-66 rule is expected to contain a provision delaying its entry into force until nine months after its publication.

Nevertheless, the Agency understands that NAAs and Stakeholders would be in a better position to plan the implementation of the expected changes if the list of Part-66 Type Ratings also contains the classification of type ratings according to the new aircraft groups (3 groups).

As a consequence the Agency will take the following actions:

- Publish the Decision following this CRD, containing the list of type ratings with the current 13 groups.
- As soon as the new Part-66 rule is adopted by the Commission, since the Agency has to issue the corresponding AMC/GM material, to include there the list of type ratings with 13 groups (the one contained in the Decision following this CRD) and the corresponding list of type ratings reflecting the new 3 groups.

Since this means that the Decision following this CRD needs to be published before the publication of the AMC/GM material of the future Part-66 and, in any case, the Agency would like to publish such AMC/GM material shortly after the adoption by the Commission of the new Part-66, the Agency has decided to shorten the reaction period for this CRD to one month (till 17 October 2011). This will allow having both lists published as soon as possible in case of an early adoption of the new Part-66 by the Commission.

IV. CRD table of comments, responses and resulting text

(General Comments)	-

comment	*3* comment by: *Philippe LEFEBVRE* No comment
response	*Noted*

comment	*9* comment by: *Belgium Civil Aviation* BCAA agrees on the proposed NPA and have no particular comments.
response	*Noted*

comment	*10* comment by: *Luftfahrt-Bundesamt* The LBA has no comments on NPA 2011-07.
response	*Noted* Noted

comment	*12* comment by: *UK CAA* **Page No:** Whole Document **Comment:** The format of the type rating list does not reflect the requirements of the amendment to Part-66.A.5. **Justification:** Included in Part-66.A.5 (1) is the requirement for Agency to define aircraft type ratings to be included in "Group 1". **Proposed Text:** The entire type list should be reformatted from the 13 sections of the current document to reflect the three groups defined in Part-66.A.5.
response	*Not accepted* The change to 66.A.5 is under the process for adoption and the final text should be published by the Commission by end of 2011. The format of the list of type ratings will be modified to reflect the 3 groups instead of the 13 sections once the European decision requiring such new format is published.

comment	*13* comment by: *UK CAA* **Page No:** Entire document (General comment) **Comment:** The rationale used to separate the ERJ 170 and ERJ 190 (different TCDS for Engine) highlights inadequacies in this system. The difference between the two engines is minimal when compared with the large differences between B737-600 to B737-900 but these latter two are judged to be a type series.

Justification: Inequalities across system.

response

Not accepted

We agree that there are some differences between the CFM engines fitted on the different types of B737. However, the Agency has chosen to consider the CF34-8 and the CF34-10 engine types, as they are too different in relation to the maintenance, to be put in one type rating.

- at a high level the CF34-8 is a dual rotor, axial flow, high bypass ratio turbofan; single stage fan, ten stage axial compressor, annular combustion chamber, two stage high pressure turbine, four stage low pressure turbine, a thrust reverser (CF34 –8E models only), aft core cowl (CF34 –8E models only), exhaust nozzle, exhaust centre body, starter, and a Full Authority Digital Engine Control (FADEC). The accessory gearbox is mounted on the engine front frame and provides provisions for the customer electric generator and hydraulic pump. Bleed ports are provided at both the 6th stage and the 10th stage for customer bleed air connection;
- whereas the CF34-10 is a dual rotor, axial flow, high bypass ratio turbofan with single stage fan, 3-stage axial booster or low pressure compressor, 9-stage high pressure compressor, annular combustion chamber, single stage high pressure turbine, 4-stage low pressure turbine, a thrust reverser, aft core cowl, exhaust nozzle, starter, and a full authority digital engine control (FADEC). The accessory gearbox (AGB) is mounted in the fan compartment and provides provisions for the customer IDG and hydraulic pump as well as provisions for the required engine accessories. Bleed ports are provided at both the 5th stage and the 9th stage for customer bleed air connection.

The CF34-10E engine models fitted on ERJ 190 feature a scaled CFM56-7B high pressure system combined with a derivative of the CF34-8C "growth" engine low pressure system and this is probably the simplest description of difference between the two machines. The high pressure system on the -10's much more in family with a CFM 56.

In addition the two ERJ aircraft are described on different type certificates.

As a result, we selected to keep the 2 ERJ type ratings separated.

comment

16 comment by: *SVFB/SAMA*

2011-07_NPA_of SAMA/SVFB/ASEA
Aircraft Type Ratings v03

Swiss Aircraft Maintenance Association represents Swiss Aircraft Maintenance Organisations.

The principal structuring of different aircraft types in such a list and the way its done is one acceptable way of doing it but not the only one. The FAA way of solving this by giving the responsibility to control type ratings to the organisations is a efficient way to organize TR's and we question why EASA is not considering the FAA policy, it would simplify the whole process for the agency, the NAA's and the organisations alike.

However, the difficulties are in the connection with part 66 and the regulations linked with this list which causes unnecessary costs without a safety benefit.

Sometimes it may be the different NAA's interpretation and application which is inducing more difficulties then the list (in connection with 66) itself.

Type rating courses are all the time available on a big market for airline type aircraft in list 1.
For some of the non airline type aircraft and for many aircraft in list 2 and all following list it is often difficult, sometime impossible, to locate a TR course in due time, at a convenient location or for a price in reasonable relation the aircraft/helicopter in question. This due to limits imposed, a monopoly situation is created in a to small market for competition.
Additionally, competition is blocked by the regulation dictating that candidates must go to their issuing NAA's for examinations.

What are additional difficulties

1. OJT : In GA and business environment customers are often calling in on short term. This is totally different from an airline environment, where the introduction of an new type is a long process, from evaluation over introduction with everything planned in a project. GA and Business aviation seldom has the luxury of such a planned project approach and is faced with a total different schedule, in fact , there is often no schedule at all.
2. When introducing a new type as the first maintenance organisation to maintain a specific aircraft in general and business aviation, the prescribed limitations are impossible to satisfy due to the above mentioned constraints. For example, the intro of the new certified Gulfstream G280 into service requires a special approach, as there is no opportunity to gain OJT other then on the production line of the manufacturer. This is helpful but it would not make sense to spend more than two weeks in this environment. In this case the EASA should offer special conditions, taking into account the previous experience of the maintenance organisation, which in this case had already G100, 150 and 200 in their approval. (note: in this case a satisfactory and flexible solution was found, but this should be reflected in part 66 for GA and Business Aviation)
3. Considering that Business and GA maintenance enterprises have their most valuable customer base often with customers, whom bring their aircraft in the (SME's) **s**mall and **m**edium **e**nterprises Hangar only a few times for a few hours a year just for maintenance. Therefore it is practically impossible, to fulfil the required practical experience req. as stipulated in 66.A.45 and related paragraphs.
4. We propose therefore for B1:
   - To lower the OJT requirements depending from the applicants experience. With five years of experience in comparable environment, the minimum practical training could be reduced to 5 days , with 4 years to 7 days, and so on.
5. We propose therefore for B2:
   - with three years experience in a comparable environment , the applicant should be approved to work on all product lines, he has suitable experience, regardless of TR's in his licence.
   - B2 TR's are often not available or not economical nor value for the money. It is just another authority requirement which is satisfied to follow the rule.
6.
7. Group rating lists: we see certain aircraft types with different engines are

all covered under one TR, which makes sense and would propose to streamline others as well, e.g. PA 42 with TPE-331 and PA 24 with PT6 should be covered with one single TR .

8. There are more similar examples in different lists to be adapted.
9. Group ratings list: take into account that certain aircraft or helicopters are still on that list but out of production for a time period. Not all manufacturers offer TR. The SME (145 or Part M Subpart F) has a lot of competence and there is often staff whom have 20 years experience on the type but there is no suitable 147 to provide training.
   - The manufacturer, out of producing the type of aircraft or helicopter lacks the competence and if he offers a course, has to organize this very costly.
   - The SME or some SME's together would be able to set up a syllabus and provide the training.
   - Due to the complexity of the approval process they are reluctant to do so.
   - The authority does not take the examination a per 66.A.45 (f) due to the same reason as the manufacturer, the competence has moved away from the NAA or they have other reasons not to offer this service.
   - By restricting the possibility to take the examination only at either the own NAA (which does not offer the TR examination) or by the manufacturer who is therefore in a monopoly situation, the TR is often uneconomical due to a very small customer base and therefore business opportunities are lost.
   - Some NAA's have relaxed this req by issuing an alternative method to make it possible under this difficulties to get the TR as they issue a application sheet where the lack of formal training is covered by a OJT logbook, asking for completion of a defined number of tasks and then get checked out by examination. This procedure should be available in this manner in all NAA's jurisdiction. /example attached from ENAC from their website: http://www.enac.gov.it/repository/contentmanagement/node/n1485876195/modello_rets-50.doc
10. Group rating list for e.g. HSTE on page 12 of the NPA.
    - there are only seven manufacturers for helicopters in total, and counting the important one with wide spread distribution, there are only five.
    - To be to be eligible for the full HSTE list, the list candidate must have three TR's from different manufacturers, which represents nearly 42 % of all available types for certain operators a target they never reach.
    - We propose to lift that requirement to one type for all, depending from the total experience in a similar environment.

response

Partially accepted

We have noted that only the paragraphs No. 7 and 8 from your comment are related directly to the list of type ratings contained in the AMC as modified by this NPA. The other paragraphs are related to Part-66 rule in general and a change to this rule would require a major change of the text which requires further rulemaking actions.

Regarding your comments in 7 and 8 about the grouping of type ratings, we inform you that the aircraft types listed in Lists 1, 2 and 11 are required to hold individual type ratings which cannot be subject to group ratings (as state the

titles of these lists). The PA-42 is listed in these groups.

For aircraft in the other groups, full-group ratings and manufacturer group ratings may be made as per 66.A.45(g) when the aircraft types are representative of the group (stated also in the titles of these lists).

Nevertheless, for all the aircraft types, regardless of whether they are eligible for group ratings or not, the individual type rating is based on a type of engine. There is no rating with a mix of engine types.

Regarding the other comments, please be informed that a change to Part-66 is planned to be published by the Commission before end of 2011 further to some opinions from the Agency which simplifies the 13 lists of ratings into 3 groups:

1. Group 1: complex motor-powered aircraft as well as multiple engine helicopters, aeroplanes with maximum certified operating altitude exceeding FL290, aircraft equipped with fly-by-wire systems and other aircraft requiring an aircraft type rating when defined so by the Agency.

2. Group 2: aircraft other than those in Group 1 belonging to the following subgroups:

   – sub-group 2a: single turbo-propeller engine aeroplanes

   – sub-group 2b: single turbine engine helicopters

   – sub-group 2c: single piston engine helicopters

3. Group 3: piston engine aeroplanes other than those in Group 1.

The holder of a Part-66 licence will be required to hold type rating as follows:

1. For group 1 aircraft, the appropriate aircraft type rating.

2. For group 2 aircraft, the appropriate aircraft type rating, manufacturer sub-group rating or full sub-group rating.

3. For group 3 aircraft, the appropriate aircraft type rating or full group rating.

According to this change, regarding aircraft in Group 3, the licence holders of a B1 or a B2 licence may be granted ratings following examinations but may also be granted the whole groups/sub-groups based on the relevant practical experience. This will be also the case of B2 licence holders for Group 2 aircraft.

This should answer a great part of the worries brought by your comment.

For other comments, further rulemaking actions would be necessary if the appropriate regulatory impact assessment (RIA) justifies it.

TITLE PAGE p. 1

comment *17* comment by: *FAA*

The FAA has reviewed the subject NPA and has no comments.

response *Noted*

B. Draft Decision p. 5

comment *8* comment by: *CAA-NL*

Please be adviced we have no comment on the proposed changes.

response *Noted*

B. Draft Decision - Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence - 1. Large aircraft (LA). Aeroplanes with a maximum take-off mass of more than 5700 kg, requiring type training and individual type rating p. 8-29

comment *2* comment by: *Theisen André*

Correct EASA TCDS Reference: IM.A.196

response *Partially accepted*

Your comment is correct. However, the information mentioned in the last column 'Reason for change' of the NPA will not be part of the text of the decision, as a result it cannot be taken into consideration here as a change to the text.

comment *4* comment by: *Cessna Citation European Service Center*

Attachment #1

Page 18 of the NPA:

Cessna Citation 650 commercial model should be Citation III - VI instead of III - IV, in accordance with FAA TCDS # A9NM.

response *Accepted*

Will be corrected accordingly.

comment *5* comment by: *FlightSafety International*

FlightSafety International recommends that the ratings for CJ3 and CJ4 be separated. This is the same recommendation that was made in the previous NPA/CRD where the Agency responded to CRD 2010-05 #28 with: "The Agency has taken note of the explanations provided for defining the technical differences between the CJ3 and CJ4 Cessna aircraft, however separating the type rating into 2 ratings has numerous impacts towards a great number of stakeholders dealing with these aircraft, and their opinion would be sought. As the CRD does not constitute a real consultation for a change, the Agency has decided to propose this change in a next NPA so that the consultation will be wider." FlightSafety again asks that the ratings be separated for the same reasons as the following defines.

There are at least 3 systems which are completely different, including Flight Controls, Hydraulics, and the wing. 12 other systems including, Air Conditioning, Electrical, and Navigation, are at least 75% different on the CJ4 versus the CJ3. There are an additional 5 systems with approximately 50% differences, including Lighting, Autopilot, and Communications. This leaves only 2 major systems are being relatively the same from the CJ3 to CJ4.

These changes will require the duration of the current CJ3 type training course to be significantly extended causing an unnecessary burden on the licensed technicians currently holding the rating and those seeking to acquire the rating for one or the other aircraft models. Based on these changes in the aircraft model, FlightSafety International recommends the type ratings reflect as follows:

Citation Jet CJ3-Cessna 525B (Williams FJ 44)

Citation Jet CJ4-Cessna 525C (Williams FJ 44)

response

Noted

The answer made during the CRD 2010-05 to separate the type ratings CJ3 from CJ4 at the following NPA was omitted in the NPA 2011-07, as a result this CRD proposes again (see answer to comment 18) to add it at the next NPA in 2012.

comment

18 comment by: *Cessna Aircraft Company*

Cessna recommends that the type ratings aircraft maintenance licenses for CJ3 and CJ4 be separate. While the flight characteristics of the CJ4 lend it to be grouped with the CJ family of aircraft for flight certification, the differences in the physical aspects and complexity of the systems makes this grouping for maintenance unsound. There are at least 3 systems which are significantly different, including flight controls, hydraulics, and the wing. Twelve other systems including, air conditioning, electrical, and navigation, are at least 75% different on the CJ4 versus the CJ3. There are an additional 5 systems with approximately 50% differences, including lighting, autopilot, and communications. In addition the interior cabin management CJ4 Venue system is a totally new system. This leaves only 2 major systems that are relatively the same from the CJ3 to CJ4.
If you maintain the grouping of the CJ3 and CJ4 as one type, the differences in systems would require the combination of both courses in order to train to an appropriate level for safety. The duration of the new training course would be significantly extended causing an unnecessary burden on the licensed technicians seeking to acquire the rating for only one or the other aircraft

model. Based on these changes in the aircraft model, Cessna recommends the type ratings to be kept separate as follows:
Citation Jet CJ3-Cessna 525B (Williams FJ 44)
Citation Jet CJ4-Cessna 525C (Williams FJ 44)

response

Partially accepted

We have taken note of the explanations provided. However the changes of type ratings to separate the type CJ3 from CJ4 has an important impact on licences, and we suggest to propose this change in the next NPA in 2012 in order to have a better consultation on the need to have individual training courses for the CJ3 and the CJ4. Stakeholders have time to evaluate the impacts during the NPA consultation period but not during the CRD reaction period.

comment

19 comment by: *Airbus SAS*

NPA Section to comment on:
Appendix 1: Aircraft type ratings for Part 66 aircraft maintenance license", List 1, Large Aircraft (LA)

Comment:
Airbus proposes to add to Appendix 1, List 1 "Large Aircraft (LA)", NPA Page 8 and on, a new type rating for Airbus A350 aircraft.
The type rating should be listed as following: "A350 (RR Trent XWB)"

Justification:
The A350 is in the type certification process. In parallel, Airbus is adapting its customer service and maintenance training organisation. To allow timely introduction of training for A350 customers' maintenance personnel, we would consider necessary to include the new type in Appendix 1 to Part 66 in advance of Type Certification.

response

Partially accepted

The Agency selects to add a new major type preferably at the level of an NPA consultation rather than during a CRD reaction period which should only deal with reactions to comments rather than new comments. As a result, the type "A350 (RR Trent XWB)" shall be added in the next NPA.

resulting text

CESSNA AIRCRAFT Company	650	Citation III - ~~IV~~ VI	Cessna 650 (Honeywell TFE731)

B. Draft Decision - Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence - 2. Aeroplanes of 5700 kg and below, requiring type training and individual type rating (A-tr) p. 30-35

comment

6 comment by: *FlightSafety International*

FlightSafety would like to see the type rating for the Cessna 551 moved from the Cessna 500/501/551 (PWC JT15D) to the Cessna 550/560 (JT15D). The 551 conversion to a 550 requires only the performance of an STC that moves the landing gear handle and places a placard by the entrance door. Due to its

similarity to the 550, it should be included with the 550/560 instead of the 500/501. The new ratings would be as follows:

Cessna 550/551/560 (PWC JT15D)

Cessna 500/501 (PWC JT15D)

Additionally, the Citation II is currently listed in both Group 1 (page 17) and Group 2 (page 30). The aircraft should only be listed in a single location rather than multiple groups.

response

Partially accepted

A) The change to read the proposed new ratings as follows:
Cessna 550/551/560 (PWC JT15D)

Cessna 500/501 (PWC JT15D)

has an important impact on licences, and we suggest to propose this change in the next NPA in 2012 in order to have a better consultation on the changes. Stakeholders have time to evaluate the impacts during the NPA consultation period but not during the CRD reaction period. The Agency would also add some instructions on hw to modify the licences.

B) It is correct that the Citation II is listed twice. As a result, the aircraft Cessna 551 Citation II in list 2 shall be deleted to keep only the type 550 in list 1, as this type has a MTOW above 5,7T.

resulting text

The line in section 2 which shows:

CESSNA AIRCRAFT Company	550	Citation II	Cessna 550/560 (PWC JT15D)

shall be deleted.

B. Draft Decision - Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence - 8. Aeroplane single piston engine – wooden structure / metal tube-fabric (ASPE- WS), eligible for type examinations and group ratings p. 47-48

comment

1 comment by: *Rob van den Bosch*

On Page 47 of 57: "Robin DR 400RP (Thielert)" should be changed to "Robin DR 400 series (Thielert)". The STC covers the different models of the DR400 series.

response

Accepted

"Robin DR 400RP (Thielert)" is modified to read "Robin DR 400 series (Thielert)".

resulting

Robin DR 400 Series (Thielert)

text	Cirrus SR20 / SR22 Series (Continental) XtremeAir XA42 (Lycoming)

B. Draft Decision - Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence - 10. Aeroplane single piston engine – composite structure (ASPE-CS), eligible for type examinations and group ratings p. 50

comment	*7* comment by: *Cirrus Design Corporation* The Cirrus SR2X piston aircraft line (SR20, SR22, SR22T) are all on a single Type Certificate and all use the same basic airframe. The major difference between the various models is the powerplant. Cirrus requests all three models be assessed under a common type rating endorsement, similar to how the Cessna Aircraft Company Colombia line is treated (C300, C350, C400).
response	*Accepted* Both ratings shall be grouped in a single rating.

comment	*14* comment by: *UK CAA* **Page No:** 50 **Paragraph No:** Group 10 **Comment:** Add 'Sbach Xtreme 342 (Lycoming)'. **Justification:** New aircraft type certified by EASA March 2011. **Proposed Text:** 'Sbach Xtreme 342 (Lycoming)'.
response	*Partially accepted* The aircraft is added in section 10 but with a different designation than the one proposed: XtremeAir XA42 (Lycoming) which will read: XtremeAir XA41/42 (Lycoming) once the single seat is certified.

resulting text	Cirrus SR20 / SR22 Series (Continental) XtremeAir XA42 (Lycoming)

B. Draft Decision - Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence - 12. Helicopters – Single turbine engine (HSTE), eligible for type examinations and group ratings p. 55-56

comment	*11* comment by: *EUROCOPTER*

	Due to the fact the helicopter AS 350 B3 is now equiped with Turbomeca Arriel 2D engine (EASA major change approval 10035374), our airframe and avionic courses are modified to include the three possible engine configurations (Arriel 2B, 2B1 and 2D engines). Turbomeca will deliver a unique course including Arriel 2B, 2B1 and 2D engines. As a consequence, we request the current type rating endorsement: Eurocopter AS 350 (Turbomeca Arriel 2B) To be replaced by: **Eurocopter AS 350 (Turbomeca Arriel 2)** Alain Borfigat, on behalf of Catherine Gathier, SSCC Member.
response	*Accepted* An email from Alain Borfigat on 22 June 2011 highlights that differences on the three engines (Arriel 2B, 2B1 and 2D engines) result in a minor change to the course. Therefore it is accepted that a course on Arriel 2 covering the three engine types sufficiently covers the knowledge required to endorse the type rating on the license.

resulting text	Robin DR 400 Series (Thielert) Cirrus SR20 / SR22 Series (Continental) XtremeAir XA42 (Lycoming) AS 350 (Turbomeca Arriel 2)

Appendix A - Attachments

a9nm.pdf
Attachment #1 to comment #4