



**COMMENT RESPONSE DOCUMENT (CRD)
TO NOTICE OF PROPOSED AMENDMENT (NPA) 2009-02E**

**for an Agency Opinion on a Commission Regulation establishing the
Implementing Rules for cabin crew in commercial air transport
operations**

and

**draft Decision of the Executive Director of the European Aviation Safety
Agency on Acceptable Means of Compliance and Guidance Material
related to the Implementing Rules for cabin crew in commercial air
transport operations**

***"Implementing Rules for Cabin Crew in Commercial Air Transport
Operations"***

CRD a.1 – Explanatory Note - Part-CC

Explanatory Note

I. General

1. The purpose of NPA 2009-02 "Implementing Rules for Air Operations of Community Operators", dated 30 January 2009, was to consult on requirements for air operations, leading to Agency¹ Opinions on the Implementing Rules for the organisations and personnel covered, and a Decision on the related Acceptable Means of Compliance (AMC) and Guidance Material (GM). The scope of this rulemaking activity was outlined in Terms of Reference (ToR) OPS.001² and was described in detail in the NPA.
2. NPA 2009-02 was divided into seven separate documents:
 - a. NPA 2009-02a containing the Explanatory Note and its Appendices;
 - b. NPA 2009-02b containing the Draft Opinion and Decision for Part-OPS;
 - c. NPA 2009-02c containing the Draft Opinion and Decision for Part-OR (organisation requirements containing Subpart OPS);
 - d. NPA 2009-02d containing the Draft Opinion and Decision for Part-AR (authority requirements containing Subparts GEN, OPS and CC);
 - e. NPA 2009-02e containing the Draft Opinion and Decision for Part-CC and the Supplement to Draft Opinion Part-MED;
 - f. NPA 2009-02f containing the Cross-Reference Tables between EU-OPS, JAR-OPS 3 and the proposals presented in the NPA;
 - g. NPA 2009-02g containing the Regulatory Impact Assessment (RIA).
3. The CRD for NPA 2009-02c, as well as for NPA 2009-02d, and parts of 02f and 02g relating to Parts AR and OR were published on 4 October 2010. The CRD for NPA 2009-02a, 02b, 02f, 02g and 02g1 relating to the technical requirements for air operations will be published between October and December 2010³.
4. **NPA 2009-02e** contained two draft proposals for Implementing Rules (IR) and related AMC and GM for cabin crew involved in operations of aircraft referred to in Article 4(1)(b) and (c) of Regulation (EC) No 216/2008 ('the Basic Regulation'), as follows:
 - Draft proposals for the qualification of cabin crew involved in commercial air transport operations and the related cabin crew attestation referred to in Article 8 (4) and 8 (5)(e) (Part-CC); and
 - Draft proposals for the medical fitness of cabin crew (Supplement to Part-MED).

¹ European Aviation Safety Agency.

² NPA 2009-02 on Implementing Rules for Air Operations of EU Operators
[http://www.easa.europa.eu/ws_prod/r/doc/final%20ToR%20OPS.001%20\(20.07.06\).pdf](http://www.easa.europa.eu/ws_prod/r/doc/final%20ToR%20OPS.001%20(20.07.06).pdf).

³ Part-CAT (commercial air transport operations); Part-SPA (specific approvals); Part-NCC (non-commercial operations with complex motor-powered aircraft); Part-NCO (non-commercial operations with other-than-complex motor-powered aircraft); Part-SPO (specialised operations).

II. Consultation

5. NPA 2009-02 was published on the Agency website (<http://www.easa.europa.eu>) on 30 January 2009.

The consultation period of the NPA was extended in accordance with Article 6(6) of the Rulemaking Procedure⁴ at the request of stakeholders to ensure overlap with related NPAs and to provide more time for comments taking into account the size and scope of the NPA. By 31 July 2009⁵, the closing date of the consultation period, the Agency had received 13 770 comments from over 417 commentators, including National Aviation Authorities, professional organisations, private companies and individual persons.

4. The comment review was carried out in accordance with the European Commission and EASA joint approach on 'Rulemaking in the context of the extension of Community competences'⁶, and as endorsed by the Management Board and EASA Committee. This entails a phased approach for processing the first extension rules so that available resources and the comitology process can concentrate on the proposals in sequence. It also foresees that the Comment Response Document (CRD) for NPA 2009-02 would be divided and published in phases.
5. The joint approach also envisages an advanced working method for the comment review: on the one hand timely publication of the CRD so as not to jeopardise the publication of the Regulations by 8th April 2012, the date set in Regulation (EC) No 216/2008, Article 70 (hereinafter referred to as the 'Basic Regulation'). On the other hand the Agency should provide CRDs that allow stakeholders to easily identify the changes made to the NPAs, ICAO compliance and any differences to EU-OPS/JARs, as appropriate. This working method satisfies Article 7 of the EASA Rulemaking Procedure.
6. The present CRD only focuses on NPA 2009-02e (Part-Cabin Crew). It includes an overview of the comments received, as well as a description of the changes made to the text of the NPA as a result.

III. The comment response summary table (CRST)

7. This CRD does not follow the traditional format. The Agency, in agreement with the Management Board, adopted an alternative method, referred to in paragraph 5, for processing all comments posted via the CRT. This working method is based on a comment response summary table (CRST), which includes in a single document the amended text, a summary of comments received with an indication of the source of such comments, the Agency responses and additional recommendations from review groups, as well as an indication of reference documents, where relevant. This table, to be considered the Agency working document for the redrafting of the NPA text, contains five columns:

- Column A displays amended NPA text. It shows all changes made compared to the text proposed in the NPAs. Changes are shown as follows:
 - o deleted text is shown with a strike-through: ~~deleted~~;

⁴ EASA Management Board Decision 08-2007, amending and replacing the Rulemaking Procedure, adopted at the Management Board meeting 03-2007 of 13 June 2007
http://www.easa.eu.int/ws_prod/g/management-board-decisions-and-minutes.php.

⁵ In accordance with article 6.6 of the Management Board decision 08-2007, the Agency extended the consultation period for an additional period of 2 months to ensure overlap with related NPAs (from 30/05/2009 to 31/07/2009).

⁶ EASA Management Board 03/2009, of 15 September 2009, Agenda Item 6
http://easa.europa.eu/ws_prod/g/doc/pr/PRen15092009.html.

- o new text is shown in bold: **bold**;
 - Column B provides for each title and rule paragraph or rule segment a summary of comments and an indication of their origin. Summarising comments implied that not every contribution, idea or thought provided could be documented. Every effort was made to ensure that all unique issues raised by commentators have been documented in the CRST, with the exception of comments of an editorial nature. For the latter, the results of these comments can be seen in the edited text and it is noted in column C that an editorial amendment has been made. In addition, it is evident that summarising the comments could mean simplification of the content of a comprehensive comment.
 - The indication of the origin uses the following broad categories:
 - o "MS" for Member States
 - o "IND" for Industry;
 - o "IA" for Industry representative bodies / associations, and
 - o "INDIV" for individuals not representing a Member State or Industry body.
 - Column C provides a justification for revising or not revising the rule text based on comments received and additional review group inputs;
 - Column D is used to provide the rule source reference, where relevant (Regulation (EC) No 216/2008, EU-OPS/JAR-OPS 1 Section 2);
 - Column E is used to provide the ICAO standards and recommended practices (SARPs) reference, where relevant.
8. In summarising the comments and preparing the responses, the Agency's acceptance of the comments has been classified as follows:
- 'Agreed/Partially agreed' – either the comment is agreed with and transferred to the revised text, or the comment is only agreed in part by the Agency, or agreed but only partially transferred to the revised text.
 - 'Noted' – the comment is acknowledged by the Agency but no change to the existing text is considered necessary. Taking into account the large number of repeated comments, this classification was also used for the repeated comments, the number and the source of which have been reported in the CRST (CRD c.4).
 - 'Conflict with Regulation (EC) No 216/2008/Not Accepted' – either the comment or proposed amendment is considered conflicting with the objectives foreseen by the Essential Requirements applicable to cabin crew, or the comment is not shared by the Agency.

IV. Publication of the CRD

9. This CRD includes the following documents (ref. list in Annex I):
- a. this Explanatory Note (CRD a.1);
 - b. a Cover Regulation to Part-CC (CRD b.1);
 - c. a clean version of the resulting text (CRD b.2) containing the IRs of Part-CC;
 - d. a clean version of the resulting text (CRD b.3) containing the related AMC/GM);
 - e. all comments received (CRS c.1);

- f. the CRST (CRD c.2) as described in section III above; and
 - g. the list of commentators to NPA 2009-02e (CRD c.3). It should be noted that those who commented on Part-CC could not be differentiated in this list from those who commented on the Supplement to Part-MED.
10. The Agency submitted the outcome of the comment review and the draft resulting text to the OPS.001 review groups for commercial air transport (CAT)⁷ and for non-commercial operations with complex motor-powered aircraft (NCC)⁸.
 11. The said groups were created in accordance with the Rulemaking Procedure, and included the members of the OPS.001 core drafting group as well as other experts from the Agency, National Aviation Authorities and industry, who had not been involved in the initial drafting phase.
 12. The work on the review of comments was framed by the common approach to the extension of EU competences agreed between the Agency, the European Commission and the Management Board of the Agency. This common approach established not only a detailed prioritisation of the work to be developed by the Agency, but also high level principles that would preside over the review of the comments. Among these were the adherence to ICAO SARPs, EU law and adopted Joint Aviation Requirements (JARs); the necessity to give due consideration to safety and regulatory principles and to the current distribution of the text between hard and soft law; due consideration to be given to constraints such as changes stemming from the Basic Regulation and from Joint Aviation Authorities' (JAA) NPAs which had reached consensus; the need to create proportionate requirements; and, finally, the requirement to pay special attention to the clarity, legal certainty and enforceability of the proposed regulatory text.
 13. CRD b. (resulting text) and CRD c. (comments and responses) are published on the Agency's website. The Agency's Comment Response Tool (CRT) is not being used to publish the documents due to the applied working method as explained above. However, the CRT is used to collect reactions to the CRD.
 14. The Agency's Opinion will be issued at least two months after the publication of this CRD to allow any possible reactions of the stakeholders regarding possible misunderstanding of the comments received and answers provided.
 15. Such reactions should be received by the Agency not later than 7 December 2010 and should be submitted using the Comment-Response Tool at <http://hub.easa.europa.eu/crt/>. When submitting their reactions, stakeholders are kindly invited to clearly identify the issue and, if relevant, the article/paragraph in question.

V. General analysis of the comments received on Part-CC

16. By the closing date of the consultation period of NPA 2009-02⁹, 438 comments relevant to Part-CC had been received, as follows:

⁷ Rulemaking group composition for CAT
http://www.easa.europa.eu/ws_prod/r/doc/NPA/Review%20Group/GC%20OPS%20001%20CAT.pdf.

⁸ Rulemaking group composition for NCC
http://www.easa.europa.eu/ws_prod/r/doc/NPA/Review%20Group/GC%20OPS%20001%20CMPA.pdf.

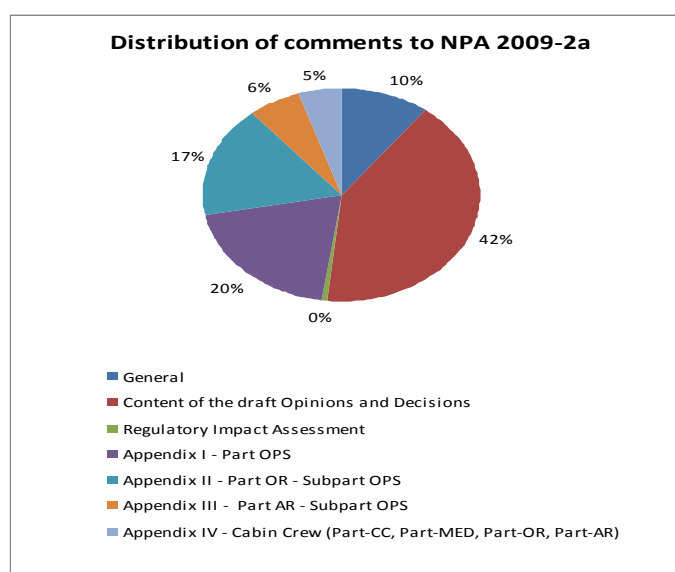
⁹ The detailed numbers of other comments received can be found in CRD of NPA 2009-02c and CRD to NPA 2009-02d published on 4 October 2010:
<http://easa.europa.eu/rulemaking/comment-response-documents-CRDs-and-review-groups.php>.

- nine comments on NPA 2009-02a (Explanatory Note and Appendices);
 - six comments on NPA 2009-02g (Regulatory Impact Assessment (RIA)); and
 - among the 941 comments received on NPA 2009-02e¹⁰, 423 comments were placed on the Draft Opinion and Decision Part-CC (whilst the other 518 comments were placed on the Supplement to Draft Opinion Part-MED).
17. Of course, not all of these comments represented individual views. Around 23% of the comments received on Part-CC were identified as duplicates, meaning that the same comment had been introduced several times.
18. When assessing the comments, the primary factors considered by the Agency were the quality and pertinence of those comments.

Comments received on NPA 2009-02a – Explanatory Note

19. Among a total of 649 comments received on NPA 2009-02a, 32 of these comments related to the Explanatory memorandum on cabin crew. Chart 1 below shows their distribution.
20. Nine of these 32 comments related to cabin crew qualifications and the related attestation process and were reiterated on Part-CC. For this reason, they will not be specifically mentioned here. They are nevertheless reported where relevant, together with the Agency's responses, in the CRST in CRD c.2.

Chart 1 – Distribution of the 649 comments to NPA 2009-02a



Comments received on NPA 2009-02g – Regulatory Impact Assessment (RIA)

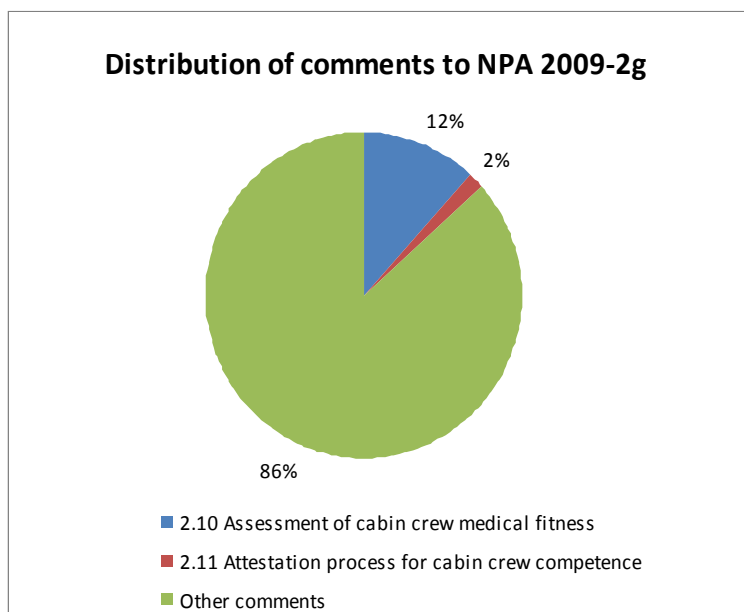
21. Chart 2 below shows the distribution of the 306 comments that were received on the RIA. 41 of these comments related to the medical fitness of cabin crew, whilst six related to the qualification of cabin crew and attestation process.

In addition to these 47 comments specifically made to points 2.10 and 2.11 of the RIA relating respectively to cabin crew medical fitness and

¹⁰ NPA 2009-02e: http://easa.europa.eu/ws_prod/r/doc/NPA/NPA%202009-02E.pdf.

competence, 17 additional comments also related to cabin crew were entered on other points of the RIA, leading to a total of 64. The six comments related to the qualification of cabin crew are reflected where relevant in the CRST (CRD c.2).

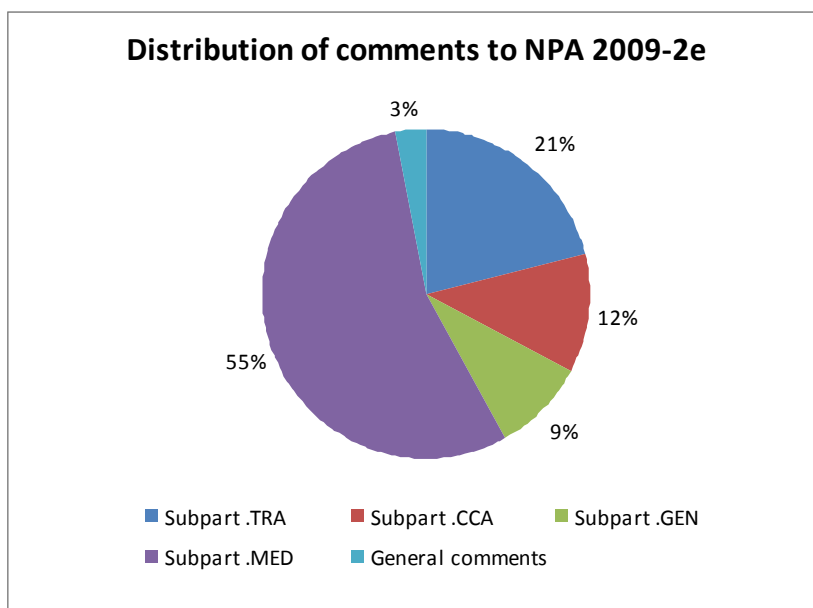
Chart 2 – Distribution of the 306 comments to NPA 2009-02g



Comments received on NPA 2009-02e

22. The following Chart 3 shows the distribution of the 941 comments received on NPA 2009-02e. The 423 comments relating to Part-CC (45%) are reported in this CRD. The other 518 comments made on the proposed Supplement to Part-MED for medical fitness of cabin crew were reported in CRD 2009-02e on Part-MED published 23 June 2010.

Chart 3 – Distribution of the 941 comments to NPA 2009-02e



VI. Description of comments received and resulting text

23. The Agency reviewed carefully the comments received on NPA 2009-02e relating to the proposed Part-CC for the qualification of cabin crew involved in commercial air transport operations and the related attestation process. Based on this, changes were made to the initial NPA draft text. The following paragraphs highlight the most significant aspects and explain the reasons behind the resulting text published in CRD b.2 (Implementing rules IRs) and in CRD b.3 (AMC/GM). Tracked changes to the initial NPA text can be seen in the CRST (CRD c.2).

Cover Regulation

24. NPA 2009-02 did not contain draft proposals for a Cover Regulation for the reasons that were detailed in the related Explanatory Note (NPA 2009-02a). The Explanatory Note described the general intentions of the Agency regarding the possible transition measures. A draft Cover Regulation for Part-CC is now published with the resulting text in CRD b.1.
25. The Cover Regulation on 'Personnel Requirements' defines the general applicability of the Parts it covers, and proposes transition measures, that may include opt-outs¹¹ if going beyond 8 April 2012. As publication of the Agency Opinions for the first extension is being carried out in phases, it is expected that the related Regulations will also be adopted in phases. Therefore, the proposal for a Cover Regulation to Part-CC should have been in theory a draft amending Regulation. However, to facilitate reading and understanding, the proposals therein are presented as amendments to the Draft Regulation¹² published 26 August 2010 with the Agency Opinion No 04/2010 on Part-FCL for pilot licensing. At the end of the adoption process by the Commission, the Regulation on Personnel Requirements will cover Part-FCL and its Annexes, Part-MED and Part-CC (ref. Chart 4).
26. The amendments proposed are only additions to cover Part-CC as the annex V to the Cover Regulation on personnel requirements. The proposed additions have been prepared after consultation of the Commission and can be summarised as follows:
- a. addition of 'qualification of cabin crew' in the 'Whereas' as relevant;
 - b. a new point 4 to include cabin crew in Article 1 '*Objective and scope*';
 - c. the definition of cabin crew in Article 2 '*Definitions*'; and
 - d. a new Article on '*Cabin Crew*' that requires cabin crew to be qualified in accordance with Part-CC, and proposes transitions measures.

NPA 2009-02e - Part-CC - Requirements for cabin crew

27. Part-CC contains the requirements for qualification, training and checking, as well as for the related attestation, applicable to cabin crew involved in commercial air transport operations. The numbering convention applied in Part-CC mirrors that used in Part-FCL and Part-MED, all to be annexes to the same Commission Regulation on personnel requirements.
28. **Comments** originated from 63 commentators. The main commentators were as follows:

¹¹ An opt-out is a type of transition measure that leaves to the Member States the choice to postpone the implementation date of a certain provision, up to a certain time limit defined by law.

¹² Agency Opinion No 04/2010 for a new Commission Regulation on personnel requirements laying down Implementing Rules for Pilot Licensing: <http://easa.europa.eu/agency-measures/opinions.php>.

- 12 Member States. Three of them disagreed with the NPA proposals. Four Member States agreed in principle with the NPA proposals, and joined the five others in proposing amendments to, or clarification of, the text.
- Four European airlines associations and 19 individual airlines from nine Member States. A majority considered that the rules should be the same as in EU-OPS. However, six individual airlines accepted the new scope of the attestation foreseen by the Basic regulation (Article 8(5)(e)).
- Eight cabin crew organisations. All were generally in agreement with the NPA proposals, and requested further improvements and clarifications to strengthen the text.
- A few other stakeholders, such as a third country aviation authority, two manufacturers and a consultant in aviation safety, expressed diverse views.

It should be noted that 19 Member States did not comment.

29. When reviewing the comments in detail,
- comments were assessed against the relevant Essential Requirements (ER) of the Basic Regulation. Furthermore, the pertinence and quality of the justification provided were also assessed, and it was noted where comments were simply statements or were well substantiated. Finally, special consideration was given where the same views were expressed by several commentators, particularly when they represented different sectors or backgrounds.
 - Following this assessment, it became clear that the classification (described in paragraph 8) required by the nature of the comments received had to take into particular account their compatibility with the Basic Regulation;
 - As mentioned above, the comments are summarised in Column B of the CRST (CRD c.2); whilst the Agency responses to the summarised comments are inserted in Column C
30. **Specific issues** - When summarising the comments, the following main issues were identified:
- **Scope of the cabin crew attestation:**
 - The proposed attestation process was accepted by several Member States, and by the cabin crew organisations, that commented to the NPA.
 - Conversely, other comments mainly from operators, and from the four Member States that had expressed the same concerns to the RIA and the Explanatory Note, disagreed with the NPA proposals. They argued that no harmonisation beyond the EU-OPS provisions was foreseen by the Basic Regulation, and that the attestation should only attest completion of initial safety training as in EU-OPS.
 - These latter comments were considered as conflicting with the Basic Regulation. Article 8(5)(e) requires the Agency to develop measures specifying the conditions applicable to the cabin crew attestations. Annex IV (ER 7.b. (i) and (ii)) further specifies the two areas to be regulated in the field of cabin crew: namely qualifications and fitness. The said conditions for the validity and use of cabin crew attestations were developed on these bases by the Agency after coordination with the Commission.

- **Conditions for the issue and use of the attestation:**
 - requirement to carry the attestation when performing duties on an aircraft: significant concerns were expressed by the operators on this proposed requirement;
 - requirement to be medically fit: this was not questioned but concerns were expressed regarding its association with the issue of the attestation.
 - **Conditions for the validity of the attestation:** clarification was requested regarding the NPA proposal to provide each cabin crew member with the list of aircraft which the cabin crew is qualified to operate on as a means to show the validity of the attestation.
 - **Definition of cabin crew:** comments by operators requested to stick to the definition of EU-OPS, without any change. Reasons of the changes made are further described in paragraph 34.
 - **The NPA proposed distribution of rules** between Part-CC and Part-OR: many comments considered that the training syllabi and related detailed AMC should be moved to Part-OR to be more user-friendly to operators.
 - **Items of the NPA that were widely accepted:**
 - the balance between IR and AMC/GM in Part-CC was considered appropriate, thus agreeing that the details of the training programmes be specified in Acceptable Means of Compliance (AMC);
 - It was also widely accepted that training and checking requirements should be the same for all cabin crew whether they are assigned to non-commercial or to commercial air transport operations.
31. When revising the NPA text on the basis of the comments summarised in the CRST and the related specific issues identified above, the following principles were followed:
- Comments and suggested changes compatible with the Basic Regulation were taken into account and used to improve and amend the text; and
 - Rules were clarified where suggested.
32. All changes envisaged as a result of the comment review were submitted to the appropriate OPS.001 Review Groups as already mentioned in paragraph 10 above. The feedback received reflected in many cases the comments received to the NPA and was used to further improve and clarify the resulting text that is now presented in CRD b.2 for the Implementing Rules and CRD b.3 for the AMC/GM.
33. Further details regarding the summary of comments and the related Agency responses can be found under each segment in the CRST in CRD c.2.
34. **Description of main changes in the resulting text:** the table below gives the new table of contents and related numbers and titles of the proposed resulting text. Charts 4 below shows the structure of Part-CC (Annex V to Cover Regulation for Personnel Requirements), whilst Chart 5 shows the horizontal structure of the Cover Regulations for the areas of air operations and flight crew licensing.

NPA rule reference	NPA rule title	CRD rule reference	CRD rule title
CC.GEN.001	Competent authority	CC.GEN.001	Competent authority
CC.GEN.005	Scope	CC.GEN.005	Scope
CC.GEN.010	Definition	xxx	<i>Transferred to Cover Regulation</i>
CC.GEN.015	Application	CC.GEN.015	Application for a cabin crew attestation
CC.GEN.020	Minimum age	CC.GEN.020	Minimum age
CC.GEN.025	Privileges and conditions	CC.GEN.025	Privileges and conditions
CC.CCA.100	Cabin crew attestation	CC.CCA.100	Issue of the cabin crew attestation
CC.CCA.105	Validity of the cabin crew attestation	CC.CCA.105	Validity of the cabin crew attestation
CC.CCA.110	Limitation, suspension and revocation of the cabin crew attestation	CC.CCA.110	Suspension and revocation of the cabin crew attestation
CC.TRA.115	Conduct of training courses, examination and checking	CC.TRA.215	Conduct of training courses, examination and checking
CC.TRA.120	Initial safety training and examination	CC.TRA.220	Initial training course and examination
CC.TRA.125	Aircraft type-specific training and checking	CC.TRA.225	Aircraft type-specific training and checking
CC.TRA.135	Recurrent training and checking	xxx	<i>Deleted - as considered already covered after consistency checks and legal review</i>
AMC/GM to Part-CC			
		AMC1- CC.GEN.025(b)	Privileges and conditions <i>New AMC resulting from the amendment of the rule to provide flexibility for the carriage of CCA as requested by comments</i>
AMC CC.TRA.115	Conduct of training courses, examination and checking	xxx	<i>Transferred to OR.OPS.CC</i>
AMC CC.TRA.120	Initial safety training and examination	AMC CC.TRA.220 (b)	Initial safety training and examination
AMC CC.TRA.120, CC.TRA.125 and CC.TRA.135	Initial, Aircraft type-specific and recurrent training and checking CRM TRAINING TABLE	GM1- CC.TRA.220 (b)	Initial safety training and examination CRM TRAINING TABLE
AMC CC.TRA.125	Aircraft type-specific training and checking	xxx	<i>Transferred to OR.OPS.CC</i>
AMC CC.TRA.135	Recurrent training and checking	xxx	<i>Transferred to OR.OPS.CC</i>

Definition of cabin crew

As with the other definitions, this definition has been moved to the Cover Regulation, in this case of Part-CC, and also of Part-OR as requested by comments. EU-OPS definition has been used as a basis and amended for consistency and legal certainty. The proposed definition now encompasses all cabin crew duties and the areas where they perform duties (inside as well as outside the aircraft cabin, e.g. after an evacuation) and to make clear that such personnel must be qualified to perform the required duties. The proposed definition takes also into account the changes occurred in the aviation environment since the initial issue of JAR-OPS 1 (that contained the cabin crew definition now in EU-OPS). These changes include strengthened aviation security measures, as well as additional tasks for cabin crew that required new training as already initiated by the Joint aviation authorities (JAA) on the basis of accident/incident investigations (e.g. crew resource management, pilot incapacitation and awareness of aircraft surface contamination).

CC.GEN.025 Privileges and conditions

The conditions specified in this rule have been notably revised for clarification and consistency, particularly as regards:

- the link with the list of aircraft cabin crew are qualified to operate on;
- the carriage of the attestation with the list of aircraft when operating (transferred from CC.GEN.100(c)); and
- the link with other applicable requirements.

Flexibility has been provided, as required by comments, with a change to the rule and the carriage of attestation and list of aircraft now placed in new **AMC1-CC.GEN.025(b)**.

CC.CCA.100 Issue of the cabin crew attestation

Medical fitness remains a condition to exercise the privileges granted by the attestation. However, the proposed requirement for undergoing the initial aero-medical assessment as a pre-condition to the issue of the attestation has been deleted, as requested by comments. Also, former point (c) on carriage of the attestation has been transferred to CC.GEN.025(b)(2) as described under the paragraph above.

CC.CCA.105 Validity of the cabin crew attestation

Comments showed that the text had to be clarified to ensure compliance with Article 8 (5)(e) of the Basic Regulation. The text has therefore been notably revised to ensure that holders are made aware of the conditions that must be complied with, and to be consistent with other rules.

CC.CCA.110 Suspension and revocation of the cabin crew attestation

As requested by comments, particularly from Member States, this rule has been revised. Limitations identified are restricted to medical conditions, and are specified by an aero-medical examiner (AME), or occupational medical practitioner, when a cabin crew member does not fully comply with Part-MED. It is proposed that 'Limitations' are no longer required to be referred to the competent authority. New (b)(1), (b)(2) and (b)(3) have been added for clarification purposes as requested by comments placed under other paragraphs.

CC.TRA.215 Conduct of training courses, examination and checking

This rule has been amended for consistency and to avoid duplication: training programmes approvals are covered by the approval process of training organisation and of AOCs. It should be stressed that numerous comments received

on this rule requested further requirements / criteria to be developed at EU level for training organisations, training devices and instructors. Criteria based on those in JAR-OPS 1 Section 2 could, in accordance with the Basic Regulation, be specified for operators approved to provide cabin crew training required by this Part. However, it was not possible to do so for the training organisations themselves. Currently, the Basic regulation does not provide the legal basis, meaning that developing criteria for approving training organisations for cabin crew remain the responsibility of the Member States.

Taking into account the broad consensus on this particular issue, as well as the growing expectations of training organisations not to be excluded from the common market and to benefit from a 'European' wide approval based on common standards, the legislator may wish to consider in the future the need for an amendment to the Basic Regulation that would provide the Agency with the legal basis to initiate a rulemaking task in this field.

CC.TRA.220 Initial training course and examination

There were no significant changes made to this rule, only some editorials for clarity and consistency of the text with other rules.

CC.TRA.225 Aircraft type-specific training and checking

The requirement for aircraft type-specific training remains as the necessary link to specify conditions to 'maintain' the validity of the attestation, in accordance with Article 8(5)(e) of the Basic Regulation. However, the training programme (transposed from EU-OPS related requirements) and the related former **AMC CC.TRA.120** have been transferred to Part-OR Section VI (OR.OPS.CC), as requested by comments.

Former CC.TRA.135 Recurrent training and checking (deleted)

Some comments requested to delete this rule. Conditions for maintaining the validity of the CCA are covered by CC.CCA.105, and recurrent training requirements are specified in Part-OR (OR.OPS.CC). After further consistency checks and legal review, it was concluded that this rule would be a repetition. It is not needed here and has therefore been deleted.

Chart 4 – Cover Regulation for Personnel Requirements

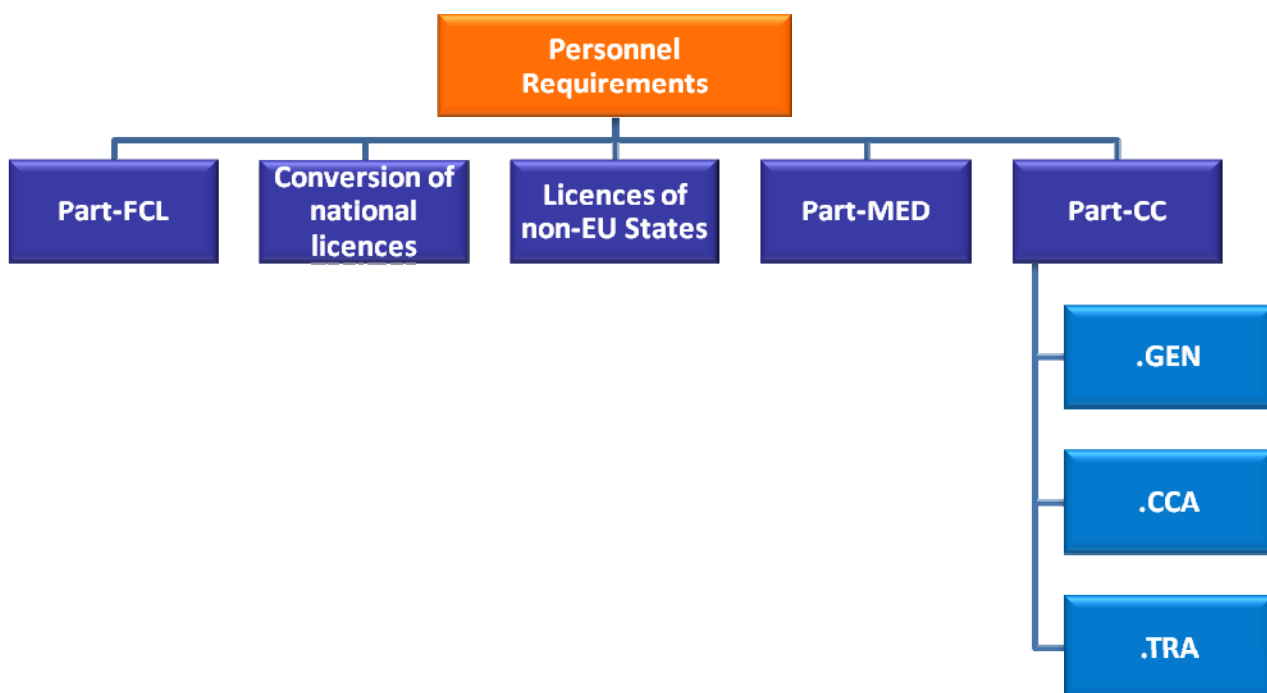
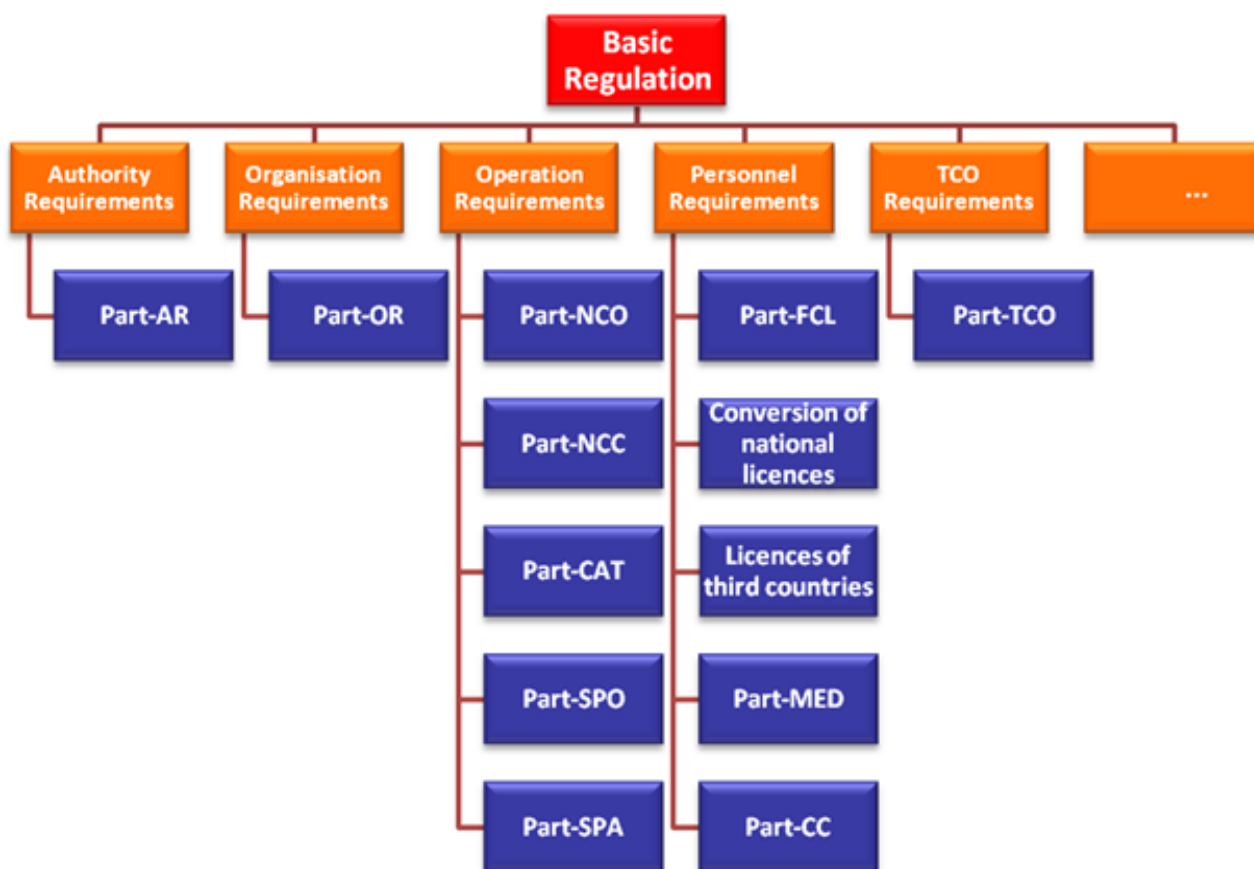


Chart 5 – BR and Cover Regulations AR – OR – OPS – PER – TCO



Annex I to the Explanatory Note

CRD documents

ORIGINAL DOCUMENT	CRD #	CONTENT
N/A	CRD a.1	Explanatory Note
	CRD B	RESULTING TEXT
NPA 2009-02e	CRD b.1	Cover Regulation
	CRD b.2	Part-CC
	CRD b.3	AMC/GM to Part-CC
	CRD C	COMMENTS AND RESPONSES
NPA 2009-02e	CRD c.1	Comments received on Part-CC
	CRD c.2	Comment Response Summary Table (CRST)
	CRD c.3	List of commentators