



European Aviation Safety Agency — Rulemaking Directorate
Comment-Response Document 2013-03

Appendix 1 — Aircraft type ratings for Part-66 aircraft maintenance licence

CRD TO NPA 2013-03 — RMT.0461 — 10/09/2013
Related Decision 2013/024/R

EXECUTIVE SUMMARY

This Comment-Response Document (CRD) contains the comments received on NPA 2013-03 (published on 25/02/2013) and the responses, or a summary thereof, provided thereto by the Agency.

Based on the comments and responses, Decision 2013/024/R was developed.

Applicability		Process map	
Affected regulations and decisions:	AMC to Part-66	Concept Paper:	No
Affected stakeholders:	NAAAs, Industry	Rulemaking group:	No
Driver/origin:	Level playing field	RIA type:	None
Reference:	N/A	Technical consultation during NPA drafting:	No
		Publication date of the NPA:	25/02/2013
		Duration of NPA consultation:	3 months
		Review group:	No
		Focussed consultation:	No
		Publication date of the Decision:	In parallel with this CRD

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Contributors (for internal use; adjust as appropriate).....	Error! Bookmark not defined.
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1. Procedural information

1.1. The rule development procedure

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') developed this Comment-Response Document (CRD) in line with Regulation (EC) No 216/2008¹ (hereinafter referred to as the 'Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the Agency's Rulemaking Programme for 2013, under RMT.0461.

The draft AMC has been developed by the Agency. All interested parties were consulted through NPA 2013-03³, which was published on 25 Feb 2013. 9 comments were received from interested parties, including industry, national aviation authorities.

The text of this CRD has been developed by the Agency.

The process map on the title page contains the major milestones of this rulemaking activity.

1.2. The structure of this CRD and related documents

This CRD provides a summary of comments and responses as well as the full set of individual comments and responses thereto received to NPA 2013-03. The resulting rule text is provided in Decision 2013/024/R which is published in parallel to this CRD on the Agency's website.

¹ Regulation (EC) No 216/2008 of the European Parliament and the Council of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L 79, 19.3.2008, p. 1), as last amended by Commission Regulation (EU) No 6/2013 of 8 January 2013 (OJ L 4, 9.1.2013, p. 34).

² The Agency is bound to follow a structured rulemaking process as required by Article 52(1) of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as the 'Rulemaking Procedure'. See Management Board Decision concerning the procedure to be applied by the Agency for the issuing of Opinions, Certification Specifications and Guidance Material (Rulemaking Procedure), EASA MB Decision No 01-2012 of 13 March 2012.

³ <http://easa.europa.eu/rulemaking/docs/npa/2013/NPA%202013-03.pdf>.

2. Individual comments and responses

Some comments were provided for some of the type ratings. A comment from DGAC France resulted in a change in this Appendix I to introduce the aircraft which have been provided with an Specific Airworthiness Specification (SAS) as listed in the web page of the Agency in the Certification Directorate. As a result, additional ratings were added, especially in Group 3.

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

(General comments)	-
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GROUP 1 AEROPLANES

comment	2	comment by: <i>Danish Transport Authority</i>	<p>We are of the opinion that followings aircraft types do not qualify to be in Group 1, but should be listed in Group 3:</p> <p>CESSNA AIRCRAFT Company 401/402: Cessna 401/402 (Continental) 404: Cessna 404 (Continental) 411: Cessna 411 (Continental) 414: Cessna 414 (Continental) 421: Cessna 421 (Continental)</p> <p>Regarding there complexity – we are of the opinion that they are not more complex than eg. following types in group 3: Cessna 310/320 Series (Continental), Metal Cessna 335 (Continental) Metal + Pressurized Cessna 336 (Continental) Metal Cessna 340 (Continental) Metal + Pressurized</p>
response			<p><i>Not accepted</i></p> <p>The allocation of Cessna 400 Series in Group 1 is to align the list of type ratings document with Regulation (EU) No. 1149/2011 which defines the aircraft groups (their maximum cruising altitude exceed FL290). A re-allocation in Group 3 requires a change to Part-66.</p>
comment	3	comment by: <i>FlightSafety International</i>	<p>FlightSafety International agrees with the separation of the Cessna 525B/C to separate type ratings and the move of the 551 to the Cessna 550/551/560. The following is a list of supporting information for these adjustments:</p> <p>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.</p> <p>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,</p>

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)
 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 *Accepted*

The list has been modified accordingly.
 With the changes in type ratings, the privileges are modified as follows:

- Holders of previous rating Cessna 500/501/~~551~~ (PWC JT15D) get the additional types **550/560** because the type 551 is now grouped with these two;
- Holders of previous group Cessna 550/560 (PWC JT15D) get the additional **551**.

Courses need to be adjusted.

resulting text

525B	Citation Jet CJ3	Cessna 525B/E (Williams FJ 44)
525E	Citation Jet CJ4	
525C	Citation Jet CJ4	Cessna 525C (Williams FJ 44)

comment 4

comment by: *Dassault Aviation*

Dassault-Aviation ask for an addition of the two commercial designation F2000LXS and F2000S within "Falcon 2000EX EASy (PWC PW 208)" Part 66 type rating endorsement, appendix 1 page #16.

TC holder	Model	Commercial designation	Part66 Type rating endorsement
DASSAULT AVIATION	Falcon 2000EX Falcon 2000EX Falcon 2000EX Falcon 2000EX Falcon 2000EX Falcon 2000EX	F2000EX EASy F2000DX F2000LX F2000LXS F2000S	Falcon 2000EX EASy (PWC PW308)

response *Accepted*

The list has been modified accordingly.

GROUP 1 HELICOPTERS

comment 5 comment by: Eurocopter Technical Services and ILS Quality manager

In the frame of our EC 175 New certification and entry into service preparation we would like to record the new type in the AMC PART66 - Annex I Group 1
 TC holder: EUROCOPTER
 Model: EC 175 B
 PART -66 Type Rating endorsement: Eurocopter EC175 (PWC PT6C)

 Thanks a lot.

response

Accepted
 The list has been modified accordingly.

resulting text

EUROCOPTER	EC 175 B	Eurocopter EC 175 (PWC PT6)
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GROUP 3: PISTON-ENGINE AEROPLANES (Other than those in Group 1)

comment 1 comment by: AVAG, Eugenio Lanza di Casalanza

Please note that Robin DR series as well Fourniers are all wood construction, not wood/tube and fabric

response

Accepted
 The commentator is right that these aircraft have structures made of wood and fabric. Therefore, the experience 'wooden structure' is required and the one on tube covered with fabric is deleted. A note has been added on the first page of the appendix to the decision that 'Wooden structure covered with fabric is considered to fall under wooden structure'. These limitations are those listed in 66.A.45(f) for Group 3 aircraft.