COMMENT RESPONSE DOCUMENT (CRD) TO NOTICE OF PROPOSED AMENDMENT (NPA) 2010-05

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"

Explanatory Note

I. General

1. The purpose of the Notice of Proposed Amendment (NPA) 2010-05 dated 21 May 2010 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 was 66.025 and is an EASA 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 2010-05 was published on the website (http://easa.europa.eu/rulemaking/notices-of-proposed-amendment-NPA.php) on 26 May 2010.

3. By the closing date of 26 August 2010, the European Aviation Safety Agency ("the Agency") had received 32 comments from 24 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

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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 2010/002/R of 28 April 2010.

[2] Regulation (EC) No 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 organisations.

5. The Executive Director Decision will be issued at least two months after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.

6. Such reactions should be received by the Agency not later than 6 December 2010 and should be submitted using the Comment-Response Tool at http://hub.easa.europa.eu/crt.

IV. CRD table of comments, responses and resulting text

(General Comments)	-

comment	*11* comment by: *Panasonic Avionics Corporation* Attachment #1 Draft response to EASA NPA No 2010-05 (***Aircraft type ratings for Part-66 aircraft maintenance licence***) Panasonic Avionics Corporation wish to petition EASA to consider relaxing the requirement to link airframes with specific engine types, where the engine type has no bearing on the maintenance being performed. Aircraft cabin maintenance need only be restricted to the airframe type, requiring part 66 license holders performing cabin maintenance to hold all engine combinations adds no value to the maintenance and release to service activity. Panasonic wrote to EASA (Eric Sivel) on 03 November 2006 and were informed the matter would be addressed in NPA 2007-07, unfortunately this was not the case. The matter was also raised at a meeting in Cologne between Juan Anton, Frederic Knecht of EASA and representatives of Panasonic Avionics Corporation on 23 January 2008, arranged to discuss concerns relating to proposals contained in NPA 07-2007. I am unaware the matter has been progressed. I attach a copy of our letter for your convenience.
response	*Not accepted* The Agency certainly took into account the letter you sent to Mr. Eric Sivel on November 2006 as well as the meeting held on 23 January 2008 in EASA. During that meeting (as stated in the minutes) the Agency expressed that it would study the possibility to introduce a provision in Part-66 to address your concern, although caution had to be taken to ensure that it was clear that such maintenance does not deal with the engines or the interface between engine and airframe. The Agency studied this possibility and considered the following: • It was not the intention to change type training or type ratings, meaning that they would still cover aircraft/engine combinations. • The change could be introduced in 66.A.45 by allowing, under certain restrictions, that a Part-66 licence holder with a type rating on a particular aircraft/engine combination could certify maintenance on that aircraft but with other engine types. As a consequence, when preparing the text for CRD 2007-07 (after review of the comments received through the external consultation of NPA 2007-07, which was published in June 2007), the Agency drafted a proposal to change to 66.A.45 to include a paragraph reading the following: *(n) Holders of a B1 or B2 aircraft maintenance licence endorsed with an*

aircraft type rating for a particular airframe/engine combination may also exercise certification privileges on the same airframe but with a different engine combination if all the following conditions are met:

1. *The licence holder is acting as certifying staff on behalf of a Part-145 approved maintenance organisation, and*

2. *The work to be released does not involve the powerplant nor any system linked to the powerplant, and*

3. *The Part-145 has developed a procedure within the Maintenance Organisation Exposition, approved by the competent authority, describing for which specific systems certifying staff can use the provisions of this paragraph (n).*

However, the Agency received adverse reactions by several competent authorities during consultation with the review group preparing the CRD, mainly linked to the difficulty to indentify possible links of the maintenance task with the engine or the aircraft/engine interface.

As a consequence, and due to the fact that a CRD is not a document that is subject to an extensive external consultation (which is the case of an NPA), the Agency decided not to introduce the change at that stage.

Please note, that this change cannot be either introduced at the level of this CRD2010-05 because this covers only a change to the list of type ratings (Appendix I to AMC to Part-66) and, as we mentioned above, it is not the intention to remove the aircraft/engine combinations from type training and type ratings.

As a consequence, this can only be addressed through additional future rulemaking, with the agreement of EASA consultative bodies (AGNA and SSCC).

comment

18 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

The Swedish Transport Agency, Civil Aviation Department suggests that the different lists of the table should be preceded by a heading, rather than only being indicated in the first column. I.e. like the present list is organized in that sense. This is for the benefit of clarity of the table."

response

Accepted

The Decision published by the Agency will be issued in the form of tables with individual titles for each group of aircraft as requested here, but the Agency selected to leave the Excel table on the website at: https://easa.europa.eu/rulemaking/aircraft-type-ratings-for-part-66-aircraft-maintenance-licence.php to remain in the form of a single table showing in column No 1 the group in which a rating is classified. The groups can be sorted out one by one by selecting the Group on top of column 1. This was a request from NAAs.

The Opinion 5/2009 on type ratings is planned to be adopted by the Commission in 2011 which modifies this classification into simplified Groups 1 to 3. This change aligns also the text with the definition of "complex motor-

	powered aircraft" in Basic Regulation 216/2008.
comment	*19* comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)* The Swedish Transport Agency, Civil Aviation Department suggests that in column 6, the designation should only appear once, and grouped in one single “column 6 box” for each Part-66 Type rating endorsement. I.e. like the present list is organized in that sense. This is for the benefit of clarity of the table.
response	*Partially accepted* The Decision published by the Agency should show the type rating in a single box in column 6 as requested, when the rating cover several models. However, the Agency selected to leave the Excel table on the website (referred to in previous response No.18) with type ratings at each line. The reason is that the groups can be sorted out one by one by selecting the Group on top of column 1
comment	*23* comment by: *Federal Office of Civil Aviation (FOCA), Switzerland* FOCA welcomes this new NPA to have one list of aircraft type ratings for Part-66 AML and for Maintenances organisations but has few comments and proposals regarding the layout of the document and the aircraft type ratings listed.
response	*Noted*
comment	*30* comment by: *Luftfahrt-Bundesamt* The LBA has no comments on NPA 2010-05.
response	*Noted*
comment	*32* comment by: *Swiss International Airlines / Bruno Pfister* SWISS takes note of the NPA 2010-05 without further comments as we are not affected by the contents of the NPA.
response	*Noted*
comment	*33* comment by: *AWComplianceGroup* This letter is being transmitted electronically; the original will be maintained in the Cessna Airworthiness files. Cessna Aircraft Company has no comments on this issue at this time. Cessna Aircraft Company appreciates EASA’s consideration of our comments. If you require additional information or have any questions, please do not hesitate to contact Neale Eyler at telephone number 316-517-7488, facsimile number 316-206-7258, or email neyler@cessna.textron.com.
response	*Noted* We thank you for this message. However, the Agency faces some comments from Cessna Aircraft Co (No.28) and Flight Safety International (No 14) which recommends separating the CJ3 and CJ4 type ratings. This is answered in the

relevant boxes.

APPENDIX 1 to Annex IV "Acceptable Means of Compliance to Part-66" of ED p. 6-7

comment

5 comment by: *Aquila Aviation by Excellence AG*

In the List No. 10 there has been listed the Aircraft Aquila AT01. The actual TC-Holder is the AQUILA Aviation by Excellence AG instead of the former TC holder Aquila Technische Entwicklungen GmbH.
The TC has been tranfered in 2008 to the new TC-Holder.

response

Accepted

Corrected accordingly.

comment

15 comment by: *Cargolux Airlines International S.A.*

Deleting aircraft types from the individual lists because the type certificate was not validated by the Agency is not consistent with:

The inclusion of an aircraft type in the licence does not indicate that the aircraft type has been granted a type certificate under the Basic regulation and its implementing rules, this list is only intended for the maintenance purposes.

ED Decision 2009/016/R deleted the B747SP from List 1 since EASA Type Certificate Data Sheet IM.A.196 for the Boeing 747 as B747SP states that the SP is not eligible under Regulation 1702/2003..

The B747SP however was registered (and operated) in EU Member States namely Luxembourg and France.

From this operation there are Certifying Staff which held JAR-145 Release to Service Authorisation and had the aircraft type added to their Part-66 AML as per the Part-66.A.70 and Part-66.B.300 conversion process.

Consequently these Certifying Staff had the B747SP (i.e. their protected rights) withdrawn with the last AML submittal to the competent authority.

Suggest that the Agency reinstates those aircraft types in the appropriate lists for which protected rights existed or still exist.

response

Accepted

Please refer to the response to next comment No 16 from Richard Morrid.

comment

16 comment by: *Richard Morrid*

As the aircraft types are phased out from the list our Authority are removing the aircraft type ratings from the AML once the licence is submitted for renewal. This is detrimental to the licence holder as he no longer has the aircraft type rating listed on the AML. In many cases the licence holder has paid a lot of money to have the rating added to the AML in the first place and is therefore losing a protected right. Even though the AML is only required within the EU States many Non EU Countries acknowledge the licence and request aircraft types to be listed on a licence when persons are applying for

positions outside of the EU.
As "this list is only intended for the maintenance purposes" I believe once an aircraft type is added to the list it should remain so they type ratings can remain on the AML.
Another reason for the aircraft types to remain on the list is so the individual states would be able to standardise the aircraft type listed on the National privileges section of the AML.

response *Accepted*

We understand that deleting a type rating may be detrimental to the persons who made efforts to gain them on their licences.
However, the list of type ratings should be aligned with the list of aircraft certified in the EU, this is why there are changes brought to align the list with the definition of models covered by the TCDS, and not more.
The sentence you mentioned "this list is only intended for the maintenance purposes" intends to explain that some rating may be added in the list in advance to the certification process (example B787 or 747-8). This helps the approval by the CAA of courses to be conducted by the 147 approved organisations.
In the contrary, an aircraft not certified in the EU and where there is no request for a certification, cannot be mentioned in the list of type ratings.
The type rating of B 747SP will however be restored because the Agency received an application for grandfathering the certification performed previously by some Member States and which had not be mentioned to the Agency.

resulting text

10	A2	AQUILA ~~Technische Entwicklungen~~ Aviation by Excellence AG			**Aquila AT01 (Rotax)**
1	A1	THE BOEING COMPANY	B747SP		**Boeing 747SP (PW JT9D)**

AIRCRAFT TYPE RATINGS FOR PART-66 AIRCRAFT MAINTENANCE LICENCE p. 8-57

comment *1* comment by: *E.I.S. Aircraft*

TC Holder for RF 6B and RS 180 is the same, therefore same designation "EIS Aircraft" should be used.

response *Accepted*

Text has been corrected accordingly.

comment *2* comment by: *Saab AB*

Subject:
EADS CASA C-212 Version -EE
Discrepancy:
Version -EE is not present in the "AIRCRAFT TYPE RATINGS FOR PART-66 AIRCRAFT MAINTENANCE LICENCE"

	Saab is suppose to carry out some major Changes to three (3) C-212-EE aircrafts and use them for civil operation. The Certifying Staff employed by the Part-145 Organisation have all the C-212 versions in their Part-66 B1/B2/C License. When the Version -EE is not present in the Part-66 matrix, no Ceertifying Staff will be authorised to issue a CRS for this version. The TCDS 01/82 revision 8 is present on the DGAC-Spain website, showing that Model C212-EE is part of it as a civil Version. For a while ago the TCDS was transferred from DGAC to EASA. The document did not become present on the EASA website, except for a reference to the TCDS Number. The document is still not present, except for the TCDS number referred to in a **new** matrix on the EASA website with applicable models, **except** for the Version –EE. When and Why did the Agency remove Versionl –EE from the TCDS? Is the –EE considered as a Military Version by EASA? Or is –EE considered as an Annex II Aircraft?
response	*Accepted* Model CASA C212-EE has been added to the models inside the rating C212 as it as approved by the Agency.

comment	*3* comment by: *ATR Training Center* ATR-GIE TC Holder reccomends that ATR 42-500 and 72-212A models should be identified with 500 commercial designation in order to avoid misunderstanding with 600 commercial designation. Like: • ATR 42-500 commercial designation 42-500 • ATR 72-212A commercial designation 72-500 • ATR 42-500 new version with commercial designation 42-600 • ATR 72-212A new version with commercial designation 72-600 Best regards
response	*Accepted* Text has been corrected accordingly.

comment	*4* comment by: *Nayak Aircraft Services* Dear Rulemaking Team, Page 21 shows the new Embraer EMB 505 (Phenom 300) listed in A2 Rating. According to the TCDS the MTOW is 8150 kg, so the entry must be changed to A1 Rating. Regards Axel Neitzert Senior QM Nayak Aircraft Service GmbH & Co KG
response	*Accepted* Text has been corrected accordingly.

comment	*6* comment by: *R. Hasler QM Altenrhein Aviation Ltd*
response	*Noted*

comment	*7* comment by: *R. Hasler QM Altenrhein Aviation Ltd* Viking Air DHC-2T is listed and might be named as Turbo Beaver and DHC-2T Series. Why is the DHC-3T (PT6A) as Turbo Otter not listed as it was in ED Decision 2008/003/R? I assume it is under Annex II, but since you list the DHC-2, why not also the DHC-3 with PT6A. It fits well into the Group ASTE.
response	*Not accepted* Further to Decision 2008/003/R, the NPA 2009-05 explains why DHC-2 and DHC-3 are excluded, this is because they are listed as Annex II aircraft. Regarding DHC-2 Turbo-Beaver, this aircraft is already listed in List 4, but the letter T is not added as not mentioned in the TCDS (DHC-2T is a commercial designation of DHC-2 Mk III). Regarding the DHC-3T, this aircraft is not part of aircraft certified by EASA.

comment	*8* comment by: *R. Hasler QM Altenrhein Aviation Ltd* Gulfstream G100, IAI 1125/Astra are common terms. 1125 seems more correct and understandable than 125.
response	*Accepted* Text has been corrected accordingly.

comment	*9* comment by: *Dassault Aviation* Dassault Aviation agree to the proposed list for Falcon aircraft.
response	*Noted*

comment	*10* comment by: *Giovanni Oprandi* The Piper PA-22 isn't enclosed in NON EASA aircraft list and Before was non enclosed in this list. If it remain in the list, please provide instruction for the NAA that have converted national licence in LMA without this A/C, for transfer the A/C from national licence to LMA.
response	*Partially accepted* Piper PA-22 is not part of the aircraft certified within EU, therefore Piper PA-22 Series (Lycoming) shall be deleted from the list of ratings.

comment	*12* comment by: *Extra Flugzeugproduktion* Request for re-classification of the EA 400-500 aeroplane.

This is to notify that we disagree with the current classification of the EA 400-500 aeroplane on page 31 based on using the criteria shown in the explanation table on page 6. The classification "list N°. 2" given for the EA 400-500 in Column 1 should read "list N°. 4" as the initial type design EA 400 is classified as list N° 10" (page 49) which requires "type examinations and group ratings" only, and that the main difference is replacing the Continental engine by a single turboprop engine RR Corp. 250. The change in powerplant will not warrant the current classification "list N°. 2" because other aeroplanes powered by the same turboprop engine (like: Aermacchi SF260, Cessna 210 RR Corp 250, Maule MX-7) are also classified as "list N°. 2".

More detailed criteria might be established and included to the explanation table for Column 1 to clarify and substantiate the classification.

response *Accepted*

Modern turboprop aeroplanes are usually classified as requiring training, but the Extra EA-400-500 is accepted in List 4 as “Aeroplanes single turbine engine (ASTE) of 5700 kg and below, eligible for type examinations and group ratings” because changes from the piston-engine EA-400 are minimal.

comment *13* comment by: *helicoptersitalia*

Eurocopter Deutschland is currently marketing and selling the helicopter BO105 version E (like Echo). This version is missing in the list of helicopter proposed and should be added in the PART-66 Type rating endorsement "BO 105 series (RR Corp 250)"

best regards

Daniele Gosetti
Helicopters Italia

response *Not accepted*

The Bolkow BO-105 version E is a military version and is not certified by EASA.

comment *14* comment by: *FlightSafety International*

FlightSafety International recommends that the ratings for CJ3 and CJ4 be separated. 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	*Partially accepted* Please refer to the response made to the comment No.28 from Cessna Aircraft Co.

comment	*17* comment by: *TROYES AVIATION* I don't understand why the Piper Meridian PA 46-500 TP which is a single turbine prssurized engine aircraft is in list 2 and the Piper Cheyenne PA 31T which is a twinturbine pressurized aircraft in the list 3.Either they are both in list 2 or together in list 3. As a Part 145 maintenance shop, we have been maintaining both types of planes for a long time and to speak truly, the Piper Cheyenne has a lot of complicated electrical systems; plus it's a complex aircraft as it has more than 1 turbine. In a near future, there will be no more licensed mechanic to release those planes. Further, I want to remind you that Cessna 340 421 414 337P and 210P are pressurized planes as Hawker Beechcraft 58P and 60. Hope you will take my remark in consideration. Françoise Horiot TROYES AVIATION
response	*Noted* The case of the PA 46-500 TP is similar to the SF600, TBM 700, PC-12 and P-180, the Agency has considered it complex enough to require type training. Regarding the Piper PA31T which is a twin turbo-prop, currently the Agency has not considered it to be as complex as the PA 46-500 TP. Nevertheless, this aircraft will require type training once Opinion 05/2009 is adopted by the Commission (expected in 2011), because it is a complex motor-powered aircraft. The fact that Cessna 340 421, 414 337P and 210P are pressurised do not affect their current selection because this is not a criterion to consider them as requiring a type training. Regarding your comment that in the near future there will be no more licensed mechanics to release those airplanes, we assume that you refer to the difficulty to find approved Part-147 organisations providing the type training. Please note that in such a case, type training can be provided by any organisation (manufacturer, maintenance organisation, etc) as long as the course is approved by the competent authority.

comment	*21* comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)* The Swedish Transport Agency, Civil Aviation Department suggests that EADS CASA C-212-EE should be added to the CASA C-212 (Honeywell TPE 331) Type rating endorsement in List No. 1 of the table. We have recently had a case where there was a need for this entry to an AML.
response	*Accepted*

Text has been corrected accordingly.

comment

22 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

The Swedish Transport Agency, Civil Aviation Department suggests that Piper PA-46-350 converted via STC with a PWC PT6 engine should be added to List No. 2 of the table. We have recently had a case where there was a need for this entry to an AML.

response

Not accepted

Please refer to the answer made to comment No.27 from UK-CAA, which explains that the Agency currently has not selected to include the ratings coming from the combinations airframe/powerplant defined by STC.

comment

24 comment by: *Federal Office of Civil Aviation (FOCA), Switzerland*

Layout:

- To simplify and harmonize the type ratings listed and for an easier and faster looking overview of the list, FOCA proposes to keep the layout similar as the ED Decision 2009/016/R. 01/12/2009, with only one type rating listed for multiple similar models. For example: DC-9-81/82/83/87 (MD-81/ MD-82/ MD-83/ MD-87) Series & MD-88 for Part-66 type rating: **MD-80 Series (PW JT8D)**.

- To avoid mistake or confusion by copying and reading the list, type ratings listed do not have to be split at the end of the pages. See pages 9, 10, 15, 55 of the NPA.
- FOCA proposes to rename the box "Part-145 Rating" by "MO Rating" MO for Part-145 & Part-M/F Maintenance Organisations.

Aircraft type ratings:

- **Ref. Pages 20 & 21 of 57:** Part-145 **A1; Embraer : Embraer ERJ-170/190 (GE CF34)**, this rating has to be separated in two different ratings as: **Embraer ERJ-170 (GE CF34)**, **& Embraer ERJ-190 (GE CF34)**. This proposal is motivated by the engines differences training courses, Theoretical and Practical. Both engines types have the same designations "GE CF34" but the differences are and have to be separately trained.FOCA decided to continue to endorse both type ratings separately into Part-66 AML to avoid confusion between both models,170 and 190.To endorse both types,“170 with 190”, theoretical and practical training elements with practical experience have to be done on both engines types according 66.A.45. (d).

- **Ref. Pages 34 of 57:** Part-145 **A2; Pilatus Aircraft: Pilatus PC-12 (PWC PT6)** series have to be separated in two different ratings as: **PC-12 45/47 (PWC PT6)** for the classic generation and, **PC-12/47E (PWC PT6)** for the next generation (Glass Cockpit). This proposal is motivated by the two different type training courses due to the differences between avionics and other mechanicals, technical systems and construction. FOCA decided to continue to endorse both type

ratings separately into Part-66 AMLs to avoid confusion between these aforesaid versions, classic and next generation (E). This decision took place after analyses with the manufacturer Pilatus and with the Manufacturer EASA approved Part-147 Training organization.

- **Ref. Pages 36 of 57:** Part-145 **A2; VIKING AIR (Bombardier De Havilland):**
  (De Havilland) DHC-6 (PWC PT6). This rating has to be separated in two different ratings with the addition of the 400 DHC-6 Series as:
  (De Havilland) DHC-6 1/100/200/300 (PWC PT6) Series for these classic generation (CG) models and;
  (De Havilland) DHC-6 400 (PWC PT6) Series for the next generation (NG) (Glass Cockpit).
  This proposal is also motivated by the two different type training courses an applicant has to follow to get certification privileges on both aforesaid versions, classic and next generation.
  FOCA decided to continue to endorse both type ratings separately into Part-66 AMLs to avoid confusion between these both models, CG & NG. Differences training, theoretical and practical elements according 66.A.45. (d), on avionics and other mechanicals, technical systems and constructions have to be followed before the extension of AML may take place with the NG Model.

response

Partially accepted

Proposal to merge boxes of type ratings:
Merging the boxes of type ratings in column 6 of the Excel table. When the rating is repeated, it is not possible because there is a possibility to sort out the ratings in different manners, therefore having a rating at each line is necessary.

Embraer 170/190:
We accept the explanations provided for defining the technical differences between the Embraer 170 and 190 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 proposal for change, the Agency decided to propose this change in a next NPA in order that the consultation would be wider.

Pilatus PC-12
We understand the explanations suggested that it may advisable to separate the type ratings of the PC-12 aircraft because of the installation of EFIS instruments, however there are numerous other aircraft which are modified with EFIS where there is no separation of the ratings. EFIS installation is not a criterion for separating the type ratings.
A working group OSD 21.039 is currently working at defining criteria for type training ratings of pilots and mechanics.

DHC-6-400
The same explanation as for the one for PC-12 applies, which explains that it is not a criterion for separating the type ratings.

comment

25 comment by: *UK CAA*

Page: 14

Comment: The Boeing 747-400F/SF/LCF designation should be amended.

Justification: The Boeing 747-400 SF is also known as the BCF as referenced on the EASA TCDS.

Proposed Text (if applicable): Boeing 747-400F/SF/BCF//LCF

response

Partially accepted

Text has been modified but with some other changes agreed in mails exchanged with Mr Rourke Graham from UK-CAA in order not to include the model LCF not certified in the EU.

comment

26 comment by: *UK CAA*

Page: 25

Comment: Beech 300LW should be in the A2 Rating

Justification: Aircraft is below 5700 kgs

response

Not accepted

It is right that the Hawker Beechcraft Beech 300 LW is certified at a mass lower than 5700 kg, but the Agency has selected to group in a single rating all Beech 300 models because this aircraft is certified at a mass very close to 5700 Kg and it makes sense to find all Beech 300 in a single rating. In addition training for Beech 300 includes likely the model 300LW.

comment

27 comment by: *UK CAA*

Page: 31

Comment: Cessna 500 does not include the alternative Williams/Rolls engine installation approved under EASA STC.

Justification: As approved by EASA, this variant should be included.

Proposed Text (if applicable): Cessna 500 (Williams/Rolls FJ 44).

response

Not accepted

The Agency has decided not to list in the type ratings the combinations airframe/engines coming from engine installation by STC because:

- the lists compile EASA Supplemental Type Certificates issued on 03/06/2004 by EASA only,
- grandfathered' STCs for which the Agency took over responsibility on 29/09/2003 and issued prior to that date are not included at this time,
- the list of STCs is not yet comprehensive.

comment

28 comment by: *Cessna Aircraft Co*

Cessna Aircraft Company's official response to NPA 2010-05

Cessna recommends that the ratings 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. 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.
If you maintain the grouping of the CJ3 and CJ4 as one type, the differences in systems would require the addition of the new systems and changes to the existing systems to the CJ3 course. The duration of the current CJ3 type training course would 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 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

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.

comment

29 comment by: *CAA CZ*

Appendix 1 Aircraft type ratings for Part-66 aircraft maintenance licence;
List No. 4
Part-66 type rating endorsement - Zlin Z-37 T Series (Walter M601)

The Type Certificate Holder for aircraft type Zlin Z-37 T Series is „ZLIN AIRCRAFT“, not „AIRCRAFT INDUSTRIES“.

response

Accepted

Text has been corrected accordingly.

comment

31 comment by: *DAHER SOCATA Customer Services Dept*

Attachment #2

SOCOTA proposes to harmonize the part 66 type rating endorsement (list n° 6 of aircraft type ratings for part-66 aircraft maintenance licence) of its light aircraft series. At the present time almost each of the TB's or Rallye's has its own endorsement, such as the Rallye Aircraft with 10 different endorsements)

SOCATA proposes to create one endorsement for each aircraft type to be identified as follows

1 - SOCATA TB Series (Lycoming)

Including:
TB9, 10, 20 ,21, 200
The airframe fuselage structure is the same base only the powerplant differs and some options are added

2 - SOCATA Rallye Series
including
Rallye 110ST, 150, 180T, 235 / MS 883,886,887 / PZL Koliber Series (Lycoming)

MS 894 / PZL Koliber Series (Franklin)
Rallye 100 / MS 880,885,890 / Series (Continental)
MS 881 Series (Potez)

Due to the simplicity of the aircraft design it would be too much complicated to create one endorsement for each type of Rallye as established. The only significant difference will be the engine, that will incorporate more or less difference on the fuselage structure, but not too many. Adding that for powerplant work, most of the maintenance service centers rely on engine specialists suppliers to do engine checks and overall.

SOCATA ST10 (Lycoming) is no longer responsible for the type certificate (orphan aircraft), should not appear in the part-66 type rating endorsement list.
The aircraft type rating for part-66 aircraft maintenance licence would appear then as follows:

(see attachment table).

response

Partially accepted

Your comment has been partially accepted because:

- you recommend type rating as “SOCATA Rallye Series” which is not acceptable because a type rating should include the manufacturer of the engine installed (Lycoming or Continental),
- however, your recommendation to group airframes in new ratings as **SOCATA Rallye series (Continental), SOCATA Rallye series (Lycoming) and SOCATA TB Series (Lycoming)** has been accepted.

  The rating **SOCATA MS 881 (Potez)** and **SOCATA MS 894 / PZL Koliber (Franklin)** will remain unchanged because these models are valid with such engine.

  As to your recommendation, the rating **SOCATA ST10 (Lycoming)** will further be deleted.

resulting text

8	A2	EIS ~~RENE FOURNIER~~			**RF 6B (Continental)**
1	A1	EADS CASA	C-212-EE	Aviocar	**CASA C-212 (Honeywell TPE331)**
1	A1	ATR-GIE Avions de Transport Régional	ATR 42-500	42-500	**ATR 42-400/500/72-212A (PWC PW120)**

1	A1	ATR-GIE Avions de Transport Régional	ATR 42-500	42-600	**ATR 42-400/500/72-212A (PWC PW120)**
1	A1	ATR-GIE Avions de Transport Régional	ATR 72-212 A	72-500	**ATR 42-400/500/72-212A (PWC PW120)**
1	A1	ATR-GIE Avions de Transport Régional	ATR 72-212 A	72-600	**ATR 42-400/500/72-212A (PWC PW120)**
1	A1	EMBRAER	EMB-505	Phenom 300	**Embraer EMB-505 (PWC PW535)**
1	A1	GULFSTREAM AEROSPACE LP (GALP) c/o Israel Aircraft Industries	1125 Westwind Astra		**Gulfstream (IAI) 100/1125/Astra SPX (Honeywell TFE731)**
~~2~~ 4	A2	EXTRA Flugzeugproduktions- und Vertriebs-GmbH	EA 400-500		**Extra EA-400-500 (RR Corp 250)**
4	A2	ZLIN AIRCRAFT ~~INDUSTRIES~~			**Zlin Z-37 T Series (Walter M601)**
6	A2	SOCATA			**SOCATA Rallye Series (Continental)**
6	A2	SOCATA			**SOCATA Rallye Series (Lycoming)**

Appendix A - Attachments

EASA letter.pdf
Attachment #1 to comment #11

attachment to comment 31 _DAHER SOCATA Customer Services Dept_.pdf
Attachment #2 to comment #31