Comment	Response

Explanatory Note

Paragraph - **Add. info:**

Cmt. *Aero Dordogne Service*

Item 1: “large aircraft” inchanged Item 2: “complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce “Aeroplane below 5700 Kg turbine engine aircraft” (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce “Aeroplane below 5700 Kg piston(s) engine(s) aircraft”(group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.

Justification

Being too precise the sorting out is somehow not coherent ans will result in a rarefactionof mechanics having a valid licence to sign the CRS on general aviation aircraft.

Paragraph - **Add. info:** ANNEX 1 APPENDIX 1“aircraft type ratings”

Cmt. *UEA Malibos Aviation*

Too much different types for all “small “aeroplanes piston engine below 5 700 kg. PROPOSED TEXT for aeroplanes piston engine below 5700 kg : - 1 TYPE for single/multiple piston engine – wooden structure - 1 TYPE for single/ multiple piston engine – metal structure - 1 TYPE for single/mutiple piston engine – composite structure	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.

Justification

Those types of small aircraft very often fly less than 100 hours by year and it will be very difficult for mechanics to justify the '6 months experience' by type, if types are too precise. The work is not very diferent between a cessna 150 and a cessna 152 or SOCATA TB9 and TB10 or TB20 .... mechanics working on small non commercial aircrafts who are eligible to PART 66 license can justify experience and they are obliged to work following service maintenance manual of each aeroplane, to justify an experience by type of aircraft is unuseful.
Being too precise on the types of small non commercial aeroplane will result on a rarefaction of mechanics having a valid license to sign the CRS. Certainly small aircraft wouldn’t be able to fly anymore if they can’t find mechanics or workshop in their vicinity. If you maintain too precise type ratings it will conduct workshop to be specialized by type of aircraft and it’s not reasonable for a small aircraft (for example a PIPER J3 !!!) to fly several hours to joign a worshop each 25 or 50 hours !

Comment	Response

Paragraph - **Add. info:** Aircraft Type List

Comment	Response
Cmt. *ACG* Please see below the comment to the aircraft type list: "Part 1" - the rating Cessna 550/560 (PW 530) should be corrected to: Cessna 560 (PW 535) - this is the correct engine acc. to TCDS and the Cessna 550 (PW 530) as already listed - Cessna 551 (JT15D) has a MTOM below 5700 kg, so should be transfered to "Part 2" and added to the type ratings Cessna 500/501 - so the new type rating there (in "Part- 2") is Cessna 500/501/551 (PWC JT15D) - Let 410/420 (MW M601) should read Let 410/420 (WM M601) "WM for Walter Minor" "Part 2" - we would suggest to transfer the types Piper PA 46 (Continental TSIO-520), Piper PA 46 (Lycoming TIO-540) to "Part 6" and Piper PA 60 Series (Lycoming TIO-540) to "Part 5" "Part 4" - we would suggest to transfer Pilatus PC-12 (PWC PT6) to "Part 2" "Part 6" the following aircraft types should be added: - Bölkow BO 208 (Continental O-200) - LBA Flugzeugkennblatt Nr: 644 - Piaggo P 149 D (Lycoming GO-480) - Robin HR 100.... different models and engines, detailed type ratings to be specified acc. to french TCDS N 131 - Siai Marchetti S.205..., S.208...,different models and engines, detailed type ratings to be specified acc.to italian TCDS A 131 - Avion NIPPER T-66 (Stamo 1400) french TCDS N 1 (it could be that this is an "Annex II" aircraft pls check) - Moravan Z 143 L (Lycoming O-540) CAA-CZ TCDS 94-08 - Moravan Z 326 (WM 6-III) CAA-CZ TCDS "Part 8" the following aircraft types should be added: - Aviamilano P.19 (Continental O-200) - Boeing 75 "Stearman" different models and engines, detailed type ratings to be specified acc. to FAA TCDS A-743 (it could be that this is an "Annex II" aircraft pls check) - CP 301 (Continental) - LBA TCDS L-642 und L-564a - Jodel D11, D111, D112 different models and engines, detailed type ratings to be specified acc. to french TCDS N 3 - Piper J3 , Piper PA-11 different models and engines, detailed type ratings to be specified acc. to FAA TCDS A-691 - Pitts S-1/S-2 different models and engines, detailed type ratings to be specified acc. to FAA TCDS A8SO - Robin DR 300/400 Series.... different models and engines, detailed type ratings to be specified acc. to french TCDS N 121 - Saab 91D Safir different models and engines, detailed type ratings to be specified acc. to swedish TCDS 9B	Partially accepted. Please refer to the amended list.

Comment	Response
Justification	

Paragraph - **Add. info:** ANNEX 1 APPENDIX 1, “AIRCRAFT TYPE RATINGS”

Comment	Response
Cmt. *Troyes Aviation*	
Item 1: “large aircraft” inchanged Item 2: “complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce “Aeroplane below 5700 Kg turbine engine aircraft” (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce “Aeroplane below 5700 Kg piston(s) engine(s) aircraft”(group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.
Justification	
Being too precise the sorting out is somehow not coherent ans will result in a rarefactionof mechanics having a valid licence to sign the CRS on general aviation aircraft.	
Cmt. *AMO repair station*	
Item 1: “large aircraft” inchanged Item 2: “complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce “Aeroplane below 5700 Kg turbine engine aircraft” (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce “Aeroplane below 5700 Kg piston(s) engine(s) aircraft”(group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.
Justification	
Being too precise the sorting out is somehow not coherent ans will result in a rarefactionof mechanics having a valid licence to sign the CRS on general aviation aircraft.	

Comment	Response

Paragraph - **Add. info:** ANNEX 1 APPENDIX 1, “AIRCRAFT TYPE RATINGS”

Cmt. ***MTA Aviation***

Item 1: “large aircraft” inchanged Item 2: “complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce “Aeroplane below 5700 Kg turbine engine aircraft” (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce “Aeroplane below 5700 Kg piston(s) engine(s) aircraft”(group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.

Justification

Being too precise the sorting out is somehow not coherent ans will result in a rarefaction of mechanics having a valid licence to sign the CRS on general aviation aircraft.

Comment	Response

Paragraph -

Add. info: Appendix I to Part-66 AMC (Aircraft Type Rating List)

Comment	Response
Cmt. *Mr Seehof and Ms Nikodem* <<< SEE ALSO PAPER COPY FOR UNCLARITIES >>> Dealing with an European wide valid type rating list as mentioned by EASA in NPA No. 13-2005 from the Luftfahrt-Bundesamt's point of view causes several problems which have to be addressed. JUSTIFICATION: 1. There are several types of aircraft which can't be sorted to the structures metal, wooden or composite. It's a fact that those aircrafts do have more than one structure material. Therefore the Luftfahrt Bundesamt would like to introduce mixed structure categories for those aircrafts named - composite / metal structure for aircrafts with single and multiple piston engines - wooden / metal structure for aircrats with single and multiple piston engines - composite / wooden / metal structure for aircrafts with single and multiple engines 2. According to Article 1 of Commission Regulation (EC) 2042/2003 there is no need for type ratings according to part-66 for those aircraft referred to in Annex II of Commission Regulation 1592/2002. For national civil aviation authorities it's not possible to classify these aircraft types because for example if one aircraft is unique in one country it might be popular in another. Therefore EASA should do this classification. As a consequence those aircrafts have to be maintained under national regulaions. 3. Due to the fact that small aircrafts with piston engines sometimes might be equippable with more than one engine type it doesn't make sense to note every engine type per aircraft. In addition to that those piston engines thought manufactured by different manufacturers are quite similar. The third point is that if one would apply for a type rating he has to get a type rating instruction suitable for the authority. This will cover even engine types like Wankel engines etc. 4. If for example engines are renamed for any reason this should not lead to any change in the type rating list. Therefore we should use the original names or a short form only. 5. There are many aircraft types, especially for small aircraft, missing. Others are from the LBA's point of view not correct. Please see attached list. Content 1. Large aircraft 2. Complex Aircraft below 5700 kg, requiring type rating and individual type rating 3. Aeroplanes with turbine engines below 5700 kg, multiple engines, eligible to type examinations and group ratings 4. Aeroplanes with turbine engines below 5700kg, single engine, eligible to type examinations and group ratings	1. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA. 2. The Agency is reviewing this issue at the moment. In general, Member States should designate Annex II aircraft in coordination with EASA. 3. The Agency decided during the comment review to state for piston engine aircraft the manufacturer. 4. The denomination of aircraft types and engines should follow the TCDS. 5. Partially accepted. Please refer to the amended list. Concerning the piston engines, please indicate the engine manufacturer/type. Please review the list in light of Annex II (i.e. Messerschmidt Me-108).

Comment	Response
5. Aeroplane multiple piston engines – metal structure – eligible to type examinations and group ratings 6. Aeroplane single piston engine – metal structure, eligible to type examinations and group ratings 7. Aeroplane multiple piston engines – wooden structure, eligible to type examinations and group ratings 8. Aeroplane single piston engines – wooden structure, eligible to type examinations and group ratings 9. Aeroplane multiple piston engines – composite structure, eligible to type examinations and group ratings 10. Aeroplane single piston engines – composite structure, eligible to type examinations and group ratings 11. Aeroplane multiple piston engines – composite / wooden / metal structure, eligible to type examinations and group ratings 12. Aeroplane single piston engines – composite / wooden / metal structure, eligible to type examinations and group ratings 13. Aeroplane multiple piston engines – wooden / metal structure, eligible to type examinations and group ratings 14. Aeroplane single piston engines – wooden / metal structure, eligible to type examinations and group ratings 15. Aeroplane multiple piston engines – composite / metal structure, eligible to type examinations and group ratings 16. Aeroplane single piston engines – composite / metal structure, eligible to type examinations and group ratings 17. Large helicopters, multi-engine requiring type training and individual type rating 18. Helicopters with turbine engines, eligible to type examinations and group ratings 19. Helicopters with piston engines, eligible to type examinations and group ratings 20. Aircraft according to Annex II of Regulation 1592/2002 under national regulations 1. Large aircraft delete add ATR 42/72 (PW120) ATR 42/72 (PW120/PW127) Bombardier DHC-6 (PWC PT6) --- Cessna 500/560 (PW350) Cessna 500/560 (PW350/PW355) --- Cessna 560XL/XLS (PW545) 2. Complex Aircraft below 5700 kg, requiring type rating and individual type rating delete add Beech A100 (PWC PT6) Beech 99/100/A100 (PWC PT6) --- Bombardier DHC-6 (PWC PT6) Cessna 500/501 (PWC JT15D) Cessna 500/501/551 (PWC JT15D) --- Dornier DO228 (TPE 331) --- Dornier Seastar CD2 (PWC PT6) 3. Aeroplanes with turbine engines below 5700 kg, multiple engines, eligible to type examinations and group ratings delete add --- Rockwell Aero Commander 680/690 (TPE 331)	

Comment	Response
4. Aeroplanes with turbine engines below 5700kg, single engine, eligible to type examinations and group ratings delete add --- Beech 35/36 (Allison 250) --- Beech F90 (PWC PT6) --- Cessna 207 (Allison 250) --- Cessna P210 (Allison B17F) --- Cessna U206G/TU206G (Allison 250) 5. Aeroplane multiple piston engines – metal structure – eligible to type examinations and group ratings delete add --- Aero Design 520 --- Beech 18 --- Beech 50 --- Beech C18S --- Cessna 336 --- Cessna T-50 --- De Havilland DH104 --- Dornier Do28D --- Letecke Zavody LC-103A --- Morava L200 --- Rockwell 700 --- Rockwell Aero Commander 500 --- Rockwell Twin Commander 680 --- Super Aero 45 6. Aeroplane single piston engine – metal structure, eligible to type examinations and group ratings delete add --- Aermacchi AL60 --- Aero 145 --- Antonov AN2 --- Beagle B.121 --- Beech 77 --- Beech A45 --- Bölkow BO208 --- Cerva CE 43 --- Cessna 100 Series Cessna 140 Series (RR Continental) Cessna 140/140A Series (Piston Engine) --- Cessna 200 Series --- De Havilland DH89 --- De Havilland DHC-1 --- Dornier Do 27 --- Edgar Percival EP 9 --- Forney -415 --- Globe GC-1A	

Comment	Response
--- Grumman G-164A --- GY-80-150 --- Harvard 4 --- HR 100/200B --- HR 200/100 --- JAK 18A --- Lake LA-4-200 --- Luscombe 8 --- Maule M-4 delete add --- Messerschmidt Me-108 --- Meta-Sokol L40 --- Morane Saulnier 885 --- Morava L60 --- Navion --- Navion 6 --- Nord 1002 --- Nord 1203 --- North American AT-6 --- OMF-100 --- Piaggio P166 --- Pilatus PC-6 --- PZL 104 --- PZL 106A --- PZL Koliber 150 --- PZL M18A --- PZL M20 03 --- R3000 / 140 --- Rockwell Aero Commander 100 --- Rockwell Aero Commander 200D --- Saab 91 --- SC 01 --- SIAI-Marchetti F260 --- Socata TB10 --- St 10 --- Stinson 108 --- TECNAM P92-J --- Zenair CH2000 --- Zlin 42 --- Zlin 43 --- Zlin Z126 --- Zlin Z142 --- Zlin Z143L --- Zlin Z226 --- Zlin Z326 --- Zlin Z37A --- Zlin Z42M --- Zlin Z502 7. Aeroplane multiple piston engines – wooden structure, eligible to type examinations and	

Comment	Response
group ratings delete add 8. Aeroplane single piston engines – wooden structure, eligible to type examinations and group ratings delete add --- Bölkow BO207 --- CAP 10B --- CP 301 --- Falco F8L --- Jodel 150 --- Jodel Bébé --- Jodel D117 --- Jodel D119 --- Jodel D1190 --- Jodel D11A --- Jodel D120 --- Jodel D128 --- Jodel D140 --- Jodel DR100 --- Jodel DR250 --- Klemm KL107 --- KZ VIII --- Macchi B-308 Milan GS 6a --- Mooney M182 --- Percival Proctor 1 --- Picchio F15 --- Robin DR220 --- Robin DR253 --- Robin DR315 --- RS 180 --- Sipa 903 --- Sokol M1 --- Stampe SV4 9. Aeroplane multiple piston engines – composite structure, eligible to type examinations and group ratings delete add 10. Aeroplane single piston engines – composite structure, eligible to type examinations and group ratings delete add --- Aquila AT 01	

Comment	Response
--- Extra EA 400 --- Grob G120 --- Hoffmann H40 --- Sky Arrow 650 TC --- Wassmer WA51 11. Aeroplane multiple piston engines – composite / wooden / metal structure, eligible to type examinations and group ratings delete add 12. Aeroplane single piston engines – composite / wooden / metal structure, eligible to type examinations and group ratings delete add 13. Aeroplane multiple piston engines – wooden / metal structure, eligible to type examinations and group ratings delete add 14. Aeroplane single piston engines – wooden / metal structure, eligible to type examinations and group ratings delete add --- Aero Z131 --- Aeronca 11 --- Aeronca 50/65 --- Auster 5J1 --- Auster 5J2 --- Auster J5B --- Auster J5L --- Auster MK4 --- Auster MK5 --- Auster Taylorcraft Plus „D“ --- Aviamilano P.19 --- Beagle A.109 --- Beagle A.61 --- Beech AT11 --- Christen Aviat A1 --- Commonwealth Rearwin 185 --- De Havilland DH82A --- Fairchild 24H --- Fairchild 24W --- Fairchild M62 Great Lakes 2T-1A-1 --- Job 15-150 --- Klemm KL35D	

Comment	Response
--- KZ III --- KZ VII --- Mercury M28 --- Piper J3L --- Piper J5A --- Pitts S-1S --- Scheibe SF 23A --- Stinson L5 --- Taylorcraft (Universal) 19 --- Taylorcraft BC-12D --- Tipsy Nipper T66 --- Wassmer WA 40/41/421 --- Zlin 381 --- Zlin Z526 15. Aeroplane multiple piston engines – composite / metal structure, eligible to type examinations and group ratings delete add 16. Aeroplane single piston engines – composite / metal structure, eligible to type examinations and group ratings delete add 17. Large helicopters, multi-engine requiring type training and individual type rating delete add --- Agusta A109 (Allison 260) Sikorsky S61 (GE CT58) Sikorsky S61N (GE CT58) --- Sikorsky S92A (GE CT7-8) --- Sikorsky S-76 (PWC PT6) Aérospatiale SA 365 (Turbomeca Arriel) Aérospatiale SA 365 (Turbomeca Arriel) (1A, 1A2, 1C) Eurocopter AS 321/330 (Turbomeca Turmo) Eurocopter AS 321 (Turbomeca Turmo) --- Eurocopter 330 (Turbomeca Turmo) Eurocopter AS 365 N1, N2, N3 (Turbomeca Arriel 1) Eurocopter AS 365 N1, N2, N3 (Turbomeca Arriel) Eurocopter AS 365 N1, N2, N3 (Turbomeca Arriel 2C) --- Eurocopter BK 117 C-2 (Turbomeca Arriel) Eurocopter BK 117 C-2/EC 145 (Turbomeca Arriel) Eurocopter BO 105 Series (Rolls-Royce Corporation 250) Eurocopter BO 105 Series (Rolls-Royce Corporation 250-C20) Eurocopter EC155 (Turbomeca Arriel) Eurocopter EC155 (Turbomeca Arriel 2C1, 2C2) Eurocopter MBB 105 Series (Rolls-Royce Corporation 250) Eurocopter BO 105 LS-A3 (RR-Corp. 250-C28) Eurocopter MBB BK 117 C-1 (Turbomeca Arriel) Eurocopter BK 117 C-1 (Turbomeca Arriel) Eurocopter MBB BK 117 (Lycoming LTS 101) Eurocopter BK 117 (Lycoming LTS 101) MBB-BK 117 A-1/-3/-4/-B-1/-2 (LTS 101-650/-750-B1 ---	

Comment	Response
MBB-BK 117 C1 (Turbomeca Arriel 1E2) --- MBB-BK 117 C2 / EC 145 (Turbomeca Arriel 1E2) --- Aérospatiale SA 341G/J „Gazelle“ (Astazou III A) Aérospatiale SA 341G/ (Astazou III A) --- SA 342J „Gazelle“ (Astazou XIV H) Eurocopter AS 350 (Turbomeca Arriel) Eurocopter AS 350 (Turbomeca Arriel)(1B, 1D, 1D1 - 2B) Eurocopter SA 319 (Turbomeca Artouste) Eurocopter SA 319 (Turbomeca Astazou XIV B) 18. Helicopters with turbine engines, eligible to type examinations and group ratings delete add --- Aérospaciale SE 319 (Turbomeca Astazou XIB) Bell/Agusta 206 (Rolls-Royce Corporation 250) Bell/Agusta 206/206A (Rolls-Royce Corporation 250) --- Hughes 269D (RR 250-C20w) --- Hughes 369 (Allison 250-C20B) 19. Helicopters with piston engines, eligible to type examinations and group ratings delete add --- Brantly B-2 20. Aircraft under national regulations deleteadd	

Justification

Paragraph - **Add. info:** Content of draft decision, para 12

Cmt. *French AOPA*

We support the second option "Piston Engine"	Noted. Please refer to the explanatory note to this CRD.

Justification

The technology on single piston engine is not so different from one manufacturer to an other specially for MTOW < 2,7t mainly powered by 2 manufacturers. Maintenance manuals, Maintenance practices are very similar. If some engine are judged needing some particular capability for maintenance, the Agency keep the possibility to add aircraft to § "2. Complex aircraft below 5700kg, requiring type training and individual type rating. " Economical impact is too high, because too more training increase dramatically the cost of maintenance in our country where the number of aircraft with MTOW < 5,7t is not increasing. The increase of fuel price is more severe on piston engine.

Comment	Response

Paragraph - **Add. info:** EASA NPA No 13/2005

Comment	Response
Cmt. *CAA, Sweden*	
Swedish CAA comments to EASA NPA No 13/2005 We have from the Swedish CAA some suggestions and questions concerning the NPA No 13/2005 and to the App I type list in general. - When a type designation is altered, the “old” designation must still be in the list for at last 5 years for the benefit of traceability of “old” designations in the licences. - There is a need to know what the criteria’s are for classing an aircraft as complex or not. (Pressurized, Avionics, Type of engine …..?) when MS are deciding whether there is a need for Type Course or Type Exam is sufficient in cases there is a new type introduced, and the App I type list hasn’t yet been updated. - There are some inconsistencies in classing various a/c into certain groups. Piper PA 46 (piston) should in our point of view, be classed as Group 6 a/c since Cessna P210N (RR Continental TSIO-520) can be found in that group (both pressurised, piston engine powered aeroplanes). - Piper PA 60 should be a group 5 a/c, while e.g. MU 2 and SA 26 perhaps should be classed as Group 2 a/c. - The criteria’s for including different versions of a certain type under one or more designations in the list is a bit vague. E.g. in the case of Bombardier CL 600-xxxx (GE CF34) one seems to have decided that there should be different designations depending on what s/n there is on the a/c, while Bae 146 and Avro RJ (very different from each other from a mechanics point of view) are classed as one type. - We also question whether there is a need to separate Airbus A300 B2/B4 from A 300-600 with the same engine, from each other. Same thing goes for Gates Learjet 35 vs. 36 and Cessna 550/560 (PWC JT15D) vs. Cessna 551 (PWC JT15D) since Cessna 500/501 (PWC JT15D) is one single type (the “1” tells you that the a/c is approved for single pilot operation). - We feel that there should be a more “coarse” philosophy (in most cases) in classing different a/c and let the Part 145 organisation take responsibilities for more details. One should bear in mind that the Part 145 organisations in the end are responsible for the authorisations of the mechanics. - We suggest that there should be a standardised designation (acronym) for each “group” e.g. AMPE-MS for “Aeroplanes Multiple Piston Engines – Metal Structure” as an entry to the licence. - There is a need to know how the criteria’s for classing an aircraft as Metal / Wooden / Composite structure is defined? Fuselage, wing, wing beam, fuselage + wing, etc..? - Engine designations are not consistent. Examples of that are: The PW 100/300/500 series engines are not designated as PWC engines (that is what they are) vs. “PT6”? - The TPE 331 engine is in some cases designated just like that (e.g. Mitsubishi MU 2B),	1. EASA is studying the issue at the moment. It may be proposed with the next amendment in approx. 4 months. 2. EASA is reviewing the issue at the moment. Furthermore, task 66.010 on the Agency's rulemaking inventory will address this issue. The task is planned to start in 2007. 3. Accepted. 4. Accepted. 5+6. The classification was taken over from the JAA. Comments to adjust the types are always welcome. EASA is reviewing the subject. 7. The Part-145 organisation is not always responsible. Within a Part-M Subpart F organisation no authorisations are needed. 8. Accepted. 9. This issue is being reviewed by EASA. 10. Accepted. 11. Accepted. 12. Accepted. 13. Accepted. 14. Cessna 550 (PW 530) has been deleted. 15. Accepted. 16. Partially accepted. Please refer to the amended list. 17. Partially accepted. Please refer to the amended list.

Comment	Response
and in some cases Honeywell TPE 331 (e.g. Piper PA 42). - The Embraer EMB 135/145 engine is designated as Rolls Royce Corporation AE3007 , while the Cessna 750 engine is designated AE 3000 (without the “7”). Both are the same but the first is a 'A', and the latter a 'C'. - Regarding piston engine powered a/c below 5700 kg we suggest that only the make of the engine should be indicated. E.g. Lycoming, without e.g. 540 (and especially not with pre- or suffixes), but in some cases perhaps more than one engine type should be specified, e.g. Cessna 172 (Lycoming/RR Continental). - What is considered to be the difference between Cessna 550/560 (PW 530) and Cessna 550 (PW 530)? Is the latter the “Bravo”? If that is the case, wouldn’t it be a facilitation to also include the “nick name”? •In group 13 (Large helicopters, Multi engine) there are a few incorrectness’s, namely: Sikorsky S55 (Wright Cyclone), Sikorsky S58 (Wright Cyclone) and Westland S55 (PW 1340), which all are single engine helicopters. There is also one version of Sikorsky S58T (PWC PT6) with a single engine. •The Lycoming T53 engine is in the case of Bell 205 far too precise designated. We also think that the Bell/Agusta 204/205 could be incorporated with that type. •In our point of view, there are some aircraft types missing in the list, such as: Type designation Suggested group Cessna 206/207 “Soloy” (RR C250) 4 De Havilland DHC-2 “Turbo Beaver” (PWC PT6) 4 De Havilland DHC-3 “Turbo Otter” (PWC PT6) 4 Cessna 336 (RR Continental) 5 Noorduyn UC-64 “Norseman” (PW Wasp) 6 De Havilland DHC-2 “Beaver” (PW Wasp) 6 De Havilland DHC-3 “Otter” (PW Wasp) 6 Republic RC-3 “Seabee” (Franklin/Lycoming) 6 MFI 15 (Lycoming) 6 Bell 206 LT (Rolls Royce Corporation 250) 11 Sikorsky S55T (Honeywell TSE 331) 12	

Justification

Comment	Response

Draft Decision

Paragraph - **Add. info:**

Cmt. *KLM*

We noted that there is some inconsistency regarding reference to RR RB211 and/or Trent engine type, in the Part-66 AML type rating list. Three types of references are used: A340 (RR RB211) A340 (Trent 500) (and A380/Trent900) A330 (RR RB211 Trent) (and B777-200/-300/RR RB211 Trent) Please review all RR RB211 and/or Trent references and align in final version.	Accepted.

Justification

Cmt. *Lufthansa*

A340, and A330, with RR engines are twice on the list	Partially accepted. The type A340 (RR RB211) has been deleted. For the type A330 (RR Trent 700) the engine denomination has been changed.

Justification

Comment	Response
Cmt. *FlightSafety International*	
I realize that it is beyond the comment period, but I was just made aware of the proposal. My comments are concerning APPENDIX I AIRCRAFT TYPE RATINGS On page 19 under 1. Large aircraft you propose removing the Cessna 525 (Will FJ 44) from the list. The Cessna 525B (Will FJ 44) is over the 5700kg weight limit and should remain in this category. On page 10 under 2. Complex aircraft below 5700kg, requiring type training and individual type rating.you have listed the Cessna 525 (Will FJ 44). There seems to be no distinguishing difference between the CitationJet models The 525B is over 5700kg while the 525, 525A are under the 5700kg weight limit. I would recommend listing the 525B (Will FJ 44) under the heavy aircraft while clarifying the 525, 525A (FJ 44) listed under the light aircraft. Thank you for your consideration	Accepted.
Justification	
Cmt. *Mulhouse Air Service*	
Item 1: “large aircraft” inchanged Item 2: “complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce “Aeroplane below 5700 Kg turbine engine aircraft” (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce “Aeroplane below 5700 Kg piston(s) engine(s) aircraft”(group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.
Justification	
Being too precise the sorting out is somehow not coherent ans will result in a rarefactionof mechanics having a valid licence to sign the CRS on general aviation aircraft.	

Comment	Response
Cmt. *EASA*	
Improvements of the Agency after further review of the NPA.	Tables 1, 11, 12, 13 Engine designations of Eastern built aircraft have been completed. Table 2 Title has been changed to “Aeroplanes of 5700kg and below, requiring type training and individual type rating (A-tr)” Table 4 Pilatus PC-6 denomination has been changed and Pilatus PC-7 has been added Thrush S2R-T Series (PWC PT 6) has been added Table 5 Aircraft Industries L200 Series (LOM) has been added Table 6 The following types have been added: Gippsland GA8 (Lycoming) Maule M4 (RR Continental) PZL-104 Wilga Series (PZL / Lycoming) PZL M 18 (PZL) PZL M 26 (Lycoming) Symphony OMF-100-160 (Lycoming) Thrush S2R (PW) Table 10 Extra EA-400 (RR Continental) has been added Table 11 Agusta A109 (Arriel) added MD900 (Turbomeca Arrius) deleted EH101 (GE CT700) deleted and Westland EH-101 (GE CT700) renamend in Agusta/ Westland EH-101 (GE CT700)
Justification	

Paragraph - **Add. info:** NPA-13-2005, Annex I, Appendix I: 1. Large Aircraft

Cmt. *CAA, UK*	
Fokker 28 - 1000/2000/3000/4000 (RR Spey) amalgamate into Fokker 28 - Series (RR Spey)	Accepted.
Justification	
Duplication of Type Rating	

Comment	Response

Paragraph - **Add. info:** NPA-13-2005, Annex 1, Appendix 1: 11 Large Helicopters Multi-Engine

Cmt. ***CAA, UK***

Wessex ratings. 2 versions are provided. Westland Wessex (RR Gnome) Westland Wessex MK 60 Series 1 (Bristol H.1200 MK660) Suggest Westland Wessex (RR Gnome)	Accepted.

Justification

Comment	Response

Paragraph - **Add. info:** AMC 66.A.45
Appendix I - Aircraft Type Ratings for Part-66 Aircraft Maintenance License

Cmt. ***Dassault***

In the past, maintenance type ratings under Part 66, for both EASA and it's predecessor the JAA, appeared to have been defined using a variety of combinations of aircraft models, airframes, engines, and avionics systems. With aircraft becoming more complex and integrated, there needs to be one technical source of information and guidance to assist EASA in establishing maintenance technician type ratings. To accurately, and precisely, define maintenance type ratings the source of decision and responsibility should be vested with the Original Equipment Manufacturers (OEM). It is essential that the Regulatory Authority rely on OEM's to be responsible for their aircraft. This assigned responsibility would assist EASA in defining aircraft types and model differences to establish the most appropriate maintenance type ratings for aircraft. It is also crucial, that these OEM's establish training guidelines and standards for the aircraft they are responsible for under the aircraft type certificate. This would shift the burden of determining maintenance type ratings and related maintenance training to the OEM with EASA's support. This would alleviate some of the workload in addressing this issue by relying on the OEM's as a sole source of information. Since Appendix I is to be updated three to four times per year according to the proposed rulemaking procedure, this could relieve some of the tasking outlined in this NPA. It would also keep the Maintenance Type Rating list more accurate and up-to-date.	Noted. EASA set up a rulemaking drafting group on task 66.011 Type training that studies these questions on the design of type training.

Justification

It is proposed that there is to be one technical source of information and guidance to assist EASA in establishing Part 66 maintenance type ratings. As the aircraft manufacturer, the OEM has the design responsibilities, and the latest and most current knowledge base regarding operations, maintainability and reliability. The OEM is expected to provide current information to the Regulatory Authorities, and to have an obligation to represent accurate and precise information defining maintenance type ratings.

If the Regulatory Authorities rely on OEM's to be responsible for maintenance type ratings for their aircraft, this would assist EASA in defining aircraft types and model differences to establish maintenance type ratings for these aircraft. In the natural progression where the OEM establishes aircraft maintenance type ratings, and subsequently defines related maintenance training requirements, it would benefit the Industry by clearly defining training standards for each aircraft type. This would shift the burden of determining maintenance training requirements to the OEM with EASA's support.

Dassault believes this responsibility for determining Mx type ratings being vested with the OEM's would parallel the process that has been accepted by Industry with regard to pilot type ratings, and related flight training standards under the Joint Operations Evaluation Board (JOEB) procedure.

Comment	Response

Paragraph - **Add. info:** AMC 66.A.45(d)
Appendix I - Aircraft Type Ratings for Part-66 Aircraft Maintenance License

Cmt. ***Dassault Falcon Service***

APPENDIX 1
AIRCRAFT TYPE RATINGS
FOR PART 66 AIRCRAFT MAINTENANCE LICENCE
…..

Dassault Falcon 10/100 (Honeywell TFE 731)
Dassault Falcon 20 (Honeywell TFE 731)
Dassault Falcon <<20-5>> (GE CF700)
Dassault Falcon 50 B (Honeywell TFE 731)

<<Dassault Falcon 50 EX (Honeywell TFE 731)>>

Dassault Falcon 200 (Honeywell ATF 731)
Dassault Falcon 900 B (Honeywell TFE 731)

<<Dassault Falcon 900 C (Honeywell TFE 731)
Dassault Falcon 900EX (Honeywell TFE 731)>>

Dassault Falcon 900EX EASy / DX (Honeywell TFE 731)
Dassault falcon 2000 (Honeywell CFE738)
Dassault Falcon 2000EX EASy (PW 308)

…..

<< add >>

Partially accepted. Engine designation for Dassault Falcon 200 has been changed.

Justification

1. Some additional models shall be identified for because they have a significant impact on training :
- The Falcon 50EX has a completely new avionics system.
- The Falcon 900EX has also a completely new avionics system.
- The Falcon 900 C has the same avionics system as the 900EX but the rest of the aircraft is the same as the F900 B, so training shall be adapted.
- Falcon 900 DX has the EASY avionics and so should be included in the EASy type rating.
2. Some precisions in denomination of models is needed.
- The Falcon 20 with engines CF700 is certified as F20-5. It is also its common denomination in the aeronautical community.
- A Falcon 50 may as well be an EX or not. The denomination of a Falcon 50 not EX is Falcon 50 B
- A Falcon 900 which is not EX may have two configurations : With the avionics system of the 900EX or not. The denomination for the former is Falcon 900C, of the latter is Falcon 900B.
3. The existing training classes have recognised the need to separate F50EX model from F50, F900EX from F900B. It is necessary to have the type rating list in accordance with the existing Part 147 courses. We, as a repair station, support the existing training classes type rating which has been developed in consensus with us.

Comment	Response

Paragraph - **Add. info:** AMC-66 Appendix I Aircraft typeratings for Part-66 aircraft maintenance licence

Comment	Response
Cmt. ***B. van Driel***	
1. Large aircraft. Aeroplanes with a maximum take-off mass of 5700 kg and above, and/or requiring type training and individual type rating [to be completed]. 1 Airbus A318 (PW6000) Add space 2 Airbus A330 (RR RB211 Trent) Add space 3 Airbus Beluga (GE CF6) Rename 4 Antonov AN32 (IPA1-20) Add space 5 Beech 400 (PW JT15) combine with Mitsubishi 6 Boeing B737- 100/200 (PW JT8D) remove space after '-' 7 Boeing B737- 300/400/500 (CFM56) remove space after '-' 8 Boeing B737- 600/700/800/900 (CFM 56) remove space after '-' 9 Boeing B747- 100 (GE CF6) remove space after '-' 10 Boeing B747- 100 (PW JT9D) remove space after '-' 11 Boeing B747- 200/300 (GE CF6) remove space after '-' 12 Boeing B747- 200/300 (PW JT9D) remove space after '-' 13 Boeing B747- 200/300 (RR RB211) remove space after '-' 14 Boeing B747- 400 (GE CF6) remove space after '-' 15 Boeing B747- 400 (PW 4000) remove space after '-' 16 Boeing B747- 400 (RR RB211) remove space after '-' 17 Boeing B757- 200/300 (PW 2000) remove space after '-' 18 Boeing B757- 200/300 (RR RB211) remove space after '-' 19 Boeing B767- 200/300 (PW 4000) remove space after '-' 20 Boeing B767- 200/300 (PW JT9D) remove space after '-' 21 Boeing B767- 200/300 (RR RB211) remove space after '-' 22 Boeing B767- 200/300/400 (GE CF6) remove space after '-' 23 Boeing B777- 200/300 (GE 90) remove space after '-' 24 Boeing B777- 200/300 (PW 4000) remove space after '-' 25 Boeing B777- 200/300 (RR RB211Trent) remove space after '-' 26 Bombardier DHC- 6 (PWC PT6) remove space after '-' 27 Bombardier DHC- 7 (PWC PT6) remove space after '-' 28 Bombardier DHC- 8-100/200/300 (PW 120) remove space after '-' 29 Bombardier DHC- 8-400 (PW 150) remove space after '-' 30 Fairchild SA 226/227/228 (Honeywell B33TPE 331) Remove 228 31 Fokker F28-1000/2000/3000/4000 (RR Spey) combine with Fokker F28 (RR spey) into F28 series 32 Fokker F70/100 (RR Tay) Delete F in F70/100 33 McD MD80 (PW JT8D) Add 'series' 34 Mitsubishi MU-300 (PW JT15) combine with Beech 400 3. Aeroplanes with turbine engines below 5700kg, multiple engine, eligible to type examinations and group ratings. 35 Add "Beech 65-80 (Lycoming IGSO 540)" 36 Add "Cessna 400 series (several piston engine types)" Add "Cessna 400 series (several turbine engine types)" 37 Add "M7 Aerospace SA226/227 series (honeywell TPE 331)" 38 Add "Nomad N24A " 4. Aeroplanes with turbine engines below 5700kg, single engine, eligible to type examinations and group ratings.	Partially accepted. Please refer to the amended list.

Comment	Response
39 Add "Cessna P210 (RR Corp 250B17)" 5. Aeroplane multiple piston engines - metal structure, eligible to type examinations and group ratings. 40 Add "Aerostar PA-60 series (Lycoming TIO-540) " 41 Add "Cessna 300 series (several piston engine types)" Add "Cessna 300 series (several turbine engine types)" 42 Add "Twin Commander Aircraft Corporation 700 (Lycoming TIO-540) " 6. Aeroplane single piston engine - metal structure, eligible to type examinations and group ratings. 43 Add "Bombardier DHC-2 (PW R985)" 10. Aeroplane single piston engine - composite structure, eligible to type examinations and group ratings. 44 Add "Noorduyn Harvard / North American AT-6 " 45 add "Thrush S2R-T series (PW PT6A)" 46 Noorduyn Harvard includes North American AT-6 (AML) 47 Boeing BV234 (Avco Lyc 5512) remove space before ')' 12. Helicopters with turbine engines, eligible to type examinations and group ratings. 48 Add "Eurocopter SA 313 B/Allouette II (Turbomeca Artouste II) " 49 Add "Eurocopter SA 316B/Allouette III (Turbomeca Artouste III) " 50 Add "Schweizer 269D (RR Corp 250C20)" 13. Helicopters with piston engines, eligible to type examinations and group ratings. 51 Robinson R22/R44 (Lycoming) Add 'series' ?! New type rating should be established in line with criteria and TCDS.	

Justification

Ad a) minor corrections of writing errors etc.
Ad b) typeratings currently used on national AML’s which are not in the list, need to be added.

Comment	Response
Cmt. ***B. van Driel***	
The value of the type ratings would significantly increase by the introduction of a cross-reference to other type rating systems and to the type certificate data sheet. It is important that the type rating of a certain aircraft is unambiguously clear for all parties involved. Parties involved can be Design/Type Certification/manufacturer/maintenance data/owner/operator/CAMO/AMO/CS/AML/Training Certificate/approved course/AMTO/etc. With the existing list, too many assumptions have to be made(whether the range of a certain typerating is wide enough or not). The cross-reference does not need to be in the Appendix I to AMC-66. To facilitate easy and quick updating, in case of the inclusion of variation within the range of the typerating, it can be established at a different position. The cross references and detailed information can be maintained by appointed responsible parties or points of contact within EASA. In case of major changes, the long NPA route would still be required, but modifications and many variants of existing aircraft can be included in existing typeratings without the NPA process.	Noted. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. You could propose an amendment to Part-66 AMC using the form on the EASA website explaining the proposal further and expanding on the justification. It will then be processed by EASA. You should also state how you intend to address the case of different aircraft on the same TCDS.
Justification	
Without cross-reference lists it is not possible to verify that the correct typerating is used. This could lead to maintenance carried out without the proper approval or release to service without the proper training or AML.	

Comment	Response
Cmt. ***B. van Driel***	
Establish additional, detailed information, in addition to typerating list in AMC-66 Appendix I. The most essential problem with the list is that it does not contain sufficient detail to establish which typerating is to be used for any one specific aircraft. A. There are two conflicting requirements. On one hand, the list needs to be general and concise to enable easy understanding, fit on a relatively small license and be enforceable. And on the other hand the list needs to be specific enough to be able to unambiguously determine the type rating for any specific aircraft and flexible to prevent delays when new or modified aircraft types are introduced. B. This comment possibly can be combined with the comment to introduce cross-references to amongst other things Type Certificate Data Sheets. C. In general my suggestion is to introduce a detailed level of information below the typerating list. This information shall be detailed enough to establish the right typerating without making assumptions.	Noted. Refer also to response to the comment above. If you are of the opinion that more details should be added you could propose an amendment to Part-66 AMC. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. The TCDS cannot always be used as some aircraft are different for maintenance purposes but are on the same TCDS. The group type ratings will shorten the list on the license.
Justification	
It is not possible to verify that for maintenance of an aircraft the correct typerating is used by the maintenance organizations and certifying staff, without making assumptions. Making assumptions may lead to release to service by personnel which is not adequately qualified.	

Paragraph - **Add. info:** ANNEX 1 APPENDIX 1, “AIRCRAFT TYPE RATINGS”

Cmt. ***Aero Photo Europe Investigation***	
Item 1: large aircraft” inchanged Item 2: complex aircraft below 5700 Kg” (type rating) inchanged Item 3: Introduce 'Aeroplane below 5700 Kg turbine engine aircraft' (group rating) (actuals groups 3 & 4) Item 4: cancelled Item 5: introduce 'Aeroplane below 5700 Kg piston(s) engine(s) aircraft' (group rating)(actuals groups 5 to 10) Item 6 to 10: cancelled Item 11 & following: inchanged	Not accepted. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.
Justification	
Being too precise the sorting out is somehow not coherent and will result in a rarefaction of mechanics having a valid licence to sign the CRS on general aviation aircraft.	

Comment	Response

Paragraph - **Add. info:** Annex 1

Cmt. ***SAMCO***

Bombardier DHC-6 (PWC PT-6) is listed as a large aircraft as well as an aircraft below 5700kg Each type of aircraft should be listed in one category only	Accepted. Aircraft has been deleted from the large aircraft table.

Justification

Different requirements exists regarding maintenance for large aircraft and aircraft below 5700 kg
Large aircraft require maintenance in accordance with Part 145, whereas aircraft below 5700kg require maintenance in accordance with Part M
By listing the aircraft in both categories it is no longer clear which requirements are applicable.

Comment	Response

Paragraph -

Add. info: Annex I – AIRCRAFT TYPE RATINGS FOR PART 66 AIRCRAFT MAINTENANCE LICENCE
- Large Helicopters Multi- Engine : § 11
- Helicopter with turbine engine : § 12

Comment	Response
Cmt. *Eurocopter* For Eurocopter Group (EC / ECD), proposal of an adapted type training and individual type rating in accordance with helicopter type certification criteria and engine types is provided in appendix. Due to helicopter specificities, Eurocopter is conducting an analysis on the T2 training courses adaptation in order to give flexibility in the B2 licenses issuance. An optimized training solution has indeed to be defined to fulfill the PARTs requirements and taking into account the operational constraints met by the civil operators and maintenance organizations. The result of this analysis may conduct Eurocopter to propose to EASA a specific type training rating for T2.	Partially accepted. Please refer also to comments from GSAC and to amended list.
Justification <<< SEE ALSO PAPER VERSION (INCLUDES TABLES) >>> Proposition of amendment of PART 66 - Annex IV Acceptable Means of Compliance (AMC) PART 66 AML - LIST OF AIRCRAFT TYPE RATINGS LARGE HELICOPTERS - Multi Engine requiring Type Training and individual type rating ENGINE Eurocopter AS 355 Rolls Royce Corporation – Allison 250 Eurocopter AS 355 Turbomeca Arrius 1 Eurocopter EC 135 Turbomeca Arrius Eurocopter EC 135 Pratt & Whitney 206 Eurocopter BO 105 Rolls Royce Corporation – Allison 250 Eurocopter BO 105 Allison C28 Eurocopter MBB-BK 117 Lycoming LTS 101-650 B1 Eurocopter MBB-BK 117 Lycoming LTS 101-750 B1 Eurocopter MBB-BK 117 Turbomeca Arriel 1 & 2 Eurocopter MBB-BK 117 C2 (EC 145) Turbomeca Arriel 1 & 2 Eurocopter SA 365 C series Turbomeca Arriel 1 Eurocopter AS 365 N Turbomeca Arriel 1 Eurocopter AS 365 N1, N2, N3 Turbomeca Arriel 1 Eurocopter AS 365 N1, N2, N3 Turbomeca Arriel 2C Eurocopter EC 155 Turbomeca Arriel 2C1/C2 Eurocopter SA 330 series Turbomeca Turmo Eurocopter SA 321 Turbomeca Turmo Eurocopter AS 332/332L/L1 Turbomeca Makila 1A/1A1 Eurocopter AS 332L2 Turbomeca Makila 1A2 Eurocopter EC 225 Turbomeca Makila 2A HELICOPTERS with turbine engine, eligible to type examination and group rating ENGINE Aerospatiale SA 3130 / 3180 Alouette II Turbomeca Artouste Aerospatiale SA 3130 / 3180 Alouette II Turbomeca Astazou II Aerospatiale SA 341 / 342 “Gazelle” Turbomeca Astazou III Aerospatiale SA 341 / 342 “Gazelle” Turbomeca Astazou XIV Aerospatiale SA 360 Turbomeca Astazou XVIII Aerospatiale SE 3160 “Alouette III” Turbomeca Artouste	

Comment	Response
Eurocopter AS 350 Turbomeca Arriel 1 Eurocopter AS 350 Turbomeca Arriel 2B Eurocopter EC 120 Turbomeca Arrius 2F Eurocopter EC 130 Turbomeca Arriel 2B Eurocopter SA 315 Turbomeca Artouste Eurocopter SA 319 Turbomeca Astazou	

Paragraph - **Add. info:** Annex I, Appendix 1.

Cmt. ***De Havilland***

In the Table, delete all reference to the de Havilland DH 114 (DH Gipsy Queen) aircraft.	Accepted.

Justification

My Company is the UK CAA approved Type Design Organization for the de Havilland range of legacy aircraft, including the DH Type 114, known as the Heron. There is only one aircraft of this type airworthy in the whole of Europe. This aircraft is based in the UK and registered G-AORG. The aircraft is operated on a Private Category Certificate of Airworthiness and is not flown for the purposes of public transport. In the UK, the aircraft's State of Design, the DH 114 has been categorized as an Annex II, non-EASA aircraft.

With only one aircraft of the type in the whole of Europe, there is no organization capable of, or qualified to give, aircraft type training on this model of aircraft. Indeed, given that this sole aircraft is not operated for the purposes of public transport, there should be no need for its maintenance to require Part 66 Licence Type Ratings. This is especially so because the aircraft maintenance regime falls outside EASA regulation because it is an Annex II aircraft.

The only sensible solution is to remove the aircraft from the table of Large Aircraft requiring Type Training and Type Rating and allow it to continue to be maintained to UK national rules.

Paragraph - **Add. info:** Annex I, Appendix I, List 2

Cmt. ***DGAC, France***

It does not appear a good idea to have an individual type rating for Beech Sferma 60	Accepted.

Justification

There is no TC holder support for this unique aircraft and thus no approved organisation for type training.

Cmt. ***DGAC, France***

Why are Socata TBM 700 and PC-12/45 included in list 2 when Pilatus PC-12 is in list 4 ?	Accepted. Pilatus PC-12 has been transferred to table no. 2.

Justification

Consistency, in addition PC12 is heavier than TBM700

Comment	Response

Paragraph - **Add. info:** Annex I, Appendix I, List 6

Cmt. *DGAC, France*

Cap 10 series, APEX AIRCRAFT (Robin) DR 300 series and DR 400 series should be added	Accepted.

Justification

Completeness

Paragraph - **Add. info:** Annex I, Appendix I, List 8

Cmt. *DGAC, France*

APEX AIRCRAFT R 2000 series and R 3000 series should be added	Accepted.

Justification

Completeness

Paragraph - **Add. info:** Apendice I § 6 "Aeroplane single piston engine – metal structure, eligible to type examinations and group ratings. "

Cmt. *Y. Ferval, French Mooney repr.*

Mooney type rating reduce to one type	Accepted.

Justification

The differences between the different planes are no sufficient to justify many type rating.
Beside there is only certification type for Mooney (M20).
Many type rating increase dramatically the cost of maintenance for small builders (only 100 aircraft in France) with the risk to don't find training course for that brand, and reduce the market.

Paragraph - **Add. info:** Appendix 1

Cmt. *CAA, UK*

Rather than maintain a list, which will largely be out of date as soon as it is published, suggest that Appendix 1 is amended to reflect that Type ratings which exactly follow the designation on the EASA Type Certificate are to be used.	Noted. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. You could propose an amendment to Part-66 AMC using the form on the EASA website explaining the proposal further and expanding on the justification. It will then be processed by EASA. You should also state how you intend to address the case of different aircraft on the same TCDS.

Justification

To ensure common standard throughout the Member States

Comment	Response
Cmt. *Rolf Greiner* Remove the type rating: Airbus A340 (RR RB211 Trent) Change the type rating: Airbus A330 (RR RB211 Trent) by Airbus A330 (RR Trent 700) Change the type rating: Airbus A319/A320/A321 (V2500) by Airbus A319/A320/A321 (IAE V2500) **Justification** Standardization of the type rating.	Accepted.
Paragraph - **Add. info:** Appendix 1 (2) **Cmt.** *CAA, Denmark* The comments are attached to this CRD. **Justification**	Noted. Appendix 1: 1st comment Further explanation on "aircraft types representative of a group" is given in AMC 66.A.45(g). 2nd comment Please refer to AMC 66.A.45(g) that gives further guidance. If you are of the opinion that a different definition for B2 group rating is needed you could propose an amendment to Part-66 using the form on the EASA website and giving the reasons for your request. It will then be processed by EASA. Appendix 2: Please specify the structure of the types.

Comment	Response

Paragraph - **Add. info:** APPENDIX 1 , Paragraph 1. Large Aircraft

Cmt. *ATR, France*

In replacement of “ATR 42/72 (PW 120)”, the following three ATR families are proposed: 'ATR 42 (no PEC)' which covers models ATR42-200/-300/-320 'ATR 72 (no PEC)' which covers models ATR72-201/-202/-211/-212 without Propeller Electronic Control 'ATR 42/72 (PEC)' which covers models ATR42-400/-500 and ATR72-201/-202/-211/-212/-212A with Propeller Electronic Control	Partially accepted. Please refer to comment from GSAC.

Justification

In the table, there is only one type indicated for ATR models. With regards to existing training necessary to get a maintenance license for ATR models, three different families are justified.
A first difference is needed to separate “basic” ATR 42 models from the other due to a lot of system differences.
A second difference is needed to separate aircraft equipped with Propeller Electronic Control from the others on which the propeller control is mechanic.

Engine is not indicated as all ATR models are fitted with engines from PW120 series.

Paragraph - **Add. info:** Appendix 1 Paragraph 1

Cmt. *CAA, UK*

The large aircraft definition in Article 2 of 2042/2003 is aircraft more than 5700 kgs. Therefore the definition in the draft decision is inconsistent as it defines large aircraft as 5700 kgs and above.	Accepted.

Justification

The Regulation must be consistent.

Paragraph - **Add. info:** Appendix 1
11. Large helicopters. Multi-engine, requiring type training and individual type training

Cmt. *Swiss Air-Ambulance Ltd*

Agusta A109K2 (Turbomeca Arriel 1K1) This type is missing on the list	Accepted.

Justification

Comment	Response

Paragraph - **Add. info:** Appendix 1, Denomination of Piston engines" Options as requested under IV chpt 12

Cmt. *Mastenbroek Aeroskill b.v.*

Option 2 seems the most universal way. Only indicate type " Piston Engine". The Manufacturer is irrelevant	Noted. Please refer to the explanatory note to this CRD. points 2.+3. The group ratings were created just for this purpose. The table reflects Part-66.A.45(g)3. group ratings that were already in place in many Member States. Having three representative aircraft in one group entitles for a group rating for all aircraft in that group. Task 66.009 on the Agency's rulemaking inventory will address the issue of group ratings for light aircraft and experience requirements. The task is planned to start in 2006. Your comment should be taken into acount when drafting the NPA.

Justification

1-Between piston engines the difference is minor, as they work under the same principles.
2-General aviation consist of much more aircraft types tha AC> 5700 kg, there is no training provision in the World (USA) to educate allt the different aircraft/engine types,. Cost for this will have extreme impact on industry, basic training under Part-66 should as before the PART 66 period provide a wide knowledge range for these systems
3-Engineers require "group" ratings to carry OUT THERE PROFESSIONAL SKILLS. There are two basic groups: Singel and Multi piston engines. The suggest groups: WOOD and COMPOSITE are not required due to the fact tha knowledge is part of the "basic training"
4-Option 1 and 3 will be hard to control by Maintenance companies and Authorities

Comment	Response

Paragraph - **Add. info:** Appendix I - Aircraft Type Ratings for Part-66 Aircraft Maintenance License

Comment	Response
Cmt. ***Dassault***	
EASA Proposed Ratings Dassault Falcon 10/100 (Honeywell TFE 731) Dassault Falcon 20 (Honeywell TFE 731) Dassault Falcon 20 (GE CF700) Dassault Falcon 50 (Honeywell TFE 731) Dassault Falcon 200 (Honeywell ATF 3-6) Dassault Falcon 900 (Honeywell TFE 731) Dassault Falcon 900EX EASy (Honeywell TFE 731) Dassault Falcon 2000 (Honeywell CFE 738) Dassault Falcon 2000EX (PW 308) Dassault Falcon 2000EX EASy (PW 308) Dassault requests the referenced Appendix 1 be revised to list maintenance type ratings for Falcon aircraft as listed below. The updated matrix outlined below provides a true picture of the types of aircraft that are in the Dassault Aviation Falcon fleet. These proposed maintenance type ratings will help define requirements to establish initial, differences and practical training requirements for maintenance type rating training. Dassault Aviation Proposed Ratings Dassault Falcon 10/100 (Honeywell TFE 731) Dassault Falcon 20-5 (Honeywell TFE 731) Dassault Falcon 20 (GE CF700) Dassault Falcon 200 (Honeywell ATF 3-6) Dassault Falcon 50B (Honeywell TFE 731) Dassault Falcon 50EX(Honeywell TFE 731) Dassault Falcon 900B (Honeywell TFE 731) Dassault Falcon 900C (Honeywell TFE 731) Dassault Falcon 900EX (Honeywell TFE 731) Dassault Falcon 900EX EASy / DX Honeywell (TFE 731) Dassault Falcon 2000 (Honeywell CFE 738) Dassault Falcon 2000EX (PW 308) Dassault Falcon 2000EX EASy (PW 308)	Partially accepted. Engines for Dassault Falcon 20 and 20-5 have been changed.
Justification	
Current regulatory requirements, (EASA Part 66.A.45 Type/task training and ratings), mandate theoretical and practical training for maintenance type ratings and outlines general Acceptable Means of Compliance in AMC 66.A.45(D) type/task training and ratings to meet these requirements. This training requirement according to regulations applies to each of the aircraft outlined in “Appendix I - Aircraft Type Ratings for Part-66 Aircraft Maintenance License”. This means that every aircraft listed requires the maintenance technician achieve the theoretical and practical task training before endorsement of each individual maintenance type rating. Dassault is very involved with determining technical training standards, and Falcon training	

Comment	Response
provided by Dassault-approved Part 147 organizations. As an OEM, Dassault expects the training to be able to provide all technicians with adequate training including up-to-date techniques and technologies to ensure aircraft safety and airworthiness. Dassault expects and requires maintenance technical training to be: - Quality, - Realistic, - Comprehensive, - Achievable; and, - Verifiable. In defining training standards, Dassault uses a task analysis process to define comprehensive training tasks. The training tasks are cross referenced to Dassault procedure cards or tasks described in related Dassault documentation and source referential. These training tasks are then used to develop theoretical and practical training content. This is currently being done for each Falcon model listed in the type rating list proposed for the updated Appendix I. Dassault wants approval of the updated proposed type ratings to allow greater flexibility in defining required theoretical and practical training tasks for Part 147 organizations. Using Dassault proposed maintenance type ratings outlined above would help ensure that the technician receiving training would be given adequate detailed theoretical and practical knowledge for a specific aircraft. These proposed type ratings also give EASA Part 145 and Part 147 organizations more flexibility in presenting the required training for a specific aircraft type. For example, the type rating training could be provided to a technician specifically for the Falcon 50EX without having to accomplish additional training for the Falcon 50B that is not required for that individual.	

Paragraph - **Add. info:** Appendix I -§1 Large aircraft

Cmt. ***GSAC***

Delete Airbus A330 (RR RB211 Trent) and replace by Airbus A330 (RR Trent 700)	Accepted.

Justification

Standardization of the designation of engine RR RB211 Trent series

Cmt. ***GSAC***

Delete Airbus A340 (RR RB211)	Accepted.

Justification

Aircraft type already created as “Airbus A340 (RR Trent 500)” which covers the A340-500 and A340-600

Comment	Response
Cmt. *GSAC*	
Delete ATR42/72 (PW 120) and replace by: ATR42 Non PEC (PW 120) ATR72 Non PEC (PW 120) ATR42/72 PEC (PW 120)	Accepted.
Justification	
The “ATR 42 without PEC” designation will cover the ATR42-200/300/320. The “ATR 72 without PEC” designation will cover the ATR72-201/202/211/212 non equipped with the Propeller Electronic Control system. The “ATR 42/72 PEC” designation will cover the ATR42-400/500 and the ATR72-201/202/211/212/212A equipped with the Propeller Electronic Control system	
Cmt. *GSAC*	
Delete Embraer EMB 135/145 (Rolls-Royce Corporation AE3007) and replace by Embraer ERJ 135/145 (Rolls-Royce Corporation AE3007)	Not accepted. Denomination in EASA TCDS is Embraer EMB 145.
Justification	
Standardization of the Embraer designation	
Cmt. *GSAC*	
Create Dassault Falcon 50 EX (Honeywell TFE 731)	Accepted.
Justification	
As written in the DGAC TCDS n°163”, the Falcon 50 EX is equipped with EFIS avionic whereas the Falcon 50 is not equipped with EFIS avionic. The difference course between F50 and F50EX is a one week class and is needed for both B1-1 and B2 technicians. A technician that can release to service a Falcon 50, is not authorized to release to service a Falcon F50EX.	
Cmt. *GSAC*	
Create Dassault Falcon 900C (Honeywell TFE 731)	Accepted.
Justification	
As written in the DGAC TCDS n°163”, the Falcon 900C is equipped with Primus 2000 avionic whereas the Falcon 900 is equipped with SPZ8000 avionic. The difference course between F900 and F900C is a one week class is needed for both B1-1 and B2 technicians. A technician that can release to service a Falcon F900, is not authorized to release to service a Falcon F900C.	

Comment	Response
Cmt. *GSAC*	
Create Dassault Falcon 900EX (Honeywell TFE 731)	Accepted.
Justification	
As written in the DGAC TCDS n°163, the Falcon 900EX is equipped with Primus 2000 avionic whereas the Falcon 900 is equipped with SPZ8000. There are significant differences on the fuel systems and on the engines. The difference course between F900 and F900EX is a one week class. A technician that can release to service a Falcon 900, is not authorized to release to service a Falcon F900EX.	
Cmt. *GSAC*	
Either keep F28 (RR Spey) and F70/100 (RR Tay) and delete F28-1000/2000/3000/4000 (RR Spey) or delete F28 (RR Spey) and F70/100 (RR Tay) and replace by F28-1000/2000/3000/4000 (RR Spey) and F28-0070/0100 (RR Tay)	Accepted. Please refer to the amended list.
Justification	
As written in EASA TCDS A037(Issue 1, 20 May 2005): F28 (RR Spey) is F28 Mark 1000/2000/3000/4000 (RR Spey) F70 (RR Tay) is F28 Mark 0070 (RR Tay) F100 (RR Tay) is F28 Mark 0100 (RR Tay)	
Cmt. *GSAC*	
Create “Gulfstream G100/IAI Astra SPX (Honeywell TFE 731) and delete IAI Astra SPX (Honeywell TFE 731).	Partially accepted. IAI Astra SPX (Honeywell TFE 731) has been deleted. New type denomination: Gulfstream G100/Astra SPX (Honeywell TFE 731).
Justification	
As written in the FAA TCDS N° A16NM, Gulfstream is the certificate holder of the Astra SPX and has named it G100 since August 2002.There is no difference between these aircrafts.	
Cmt. *GSAC*	
Create “Gulfstream G200/IAI Galaxy (PW 306) and delete IAI Galaxy (PW 306)	Partially accepted. IAI Galaxy (PW 306) has been deleted. New type denomination: Gulfstream G200/Galaxy (PW 306).
Justification	
As written in the FAA TCDS N° A53NM, Gulfstream is the certificate holder of the Galaxy and has named it G200 since January 2002.There is no difference between these aircrafts	
Cmt. *GSAC*	
Modify “Gulfstream GIV (RR Tay)” to “Gulfstream GIV/G300/G400 (RR Tay)	Accepted.
Justification	
As written in the FAA TCDS N° A12EA revision 28, the GIV can be modified to a G300 or a G400. The modifications are not major but the G300 and G400 have different flight manual. Creating a common type GIV/G300/G400 will enable NAA to ensure that G300 and G400 are taught in a GIV training session.	

Comment	Response
Cmt. *GSAC*	
Create “Gulfstream GIV-X/G450 (RR Tay)”	Accepted.
Justification	
As written in the FAA TCDS N° A12EA revision 28, the GIV-X is equipped with Honeywell advanced flight deck display (EPIC avionic) whereas the GIV is equipped either with SPZ8000 or with SPZ8400.The G450 has minor modifications with regard to GV-X but has different maintenance and flight manuals. Creating a common type GIV-X/G450, will enable NAA to ensure that G450 is taught in a GIV-X training session.	
Cmt. *GSAC*	
Appendix I -§1 Large aircraft	Accepted.
Justification	
Modify “Gulfstream GV-SP (RRD BR 710)” to “Gulfstream GV-SP/G500/G550 (RRD BR710) As written in the FAA TCDS N° A12EA revision 28, the GV-SP can be modified to a G500 or a G550. The modifications are not major but the G500 and G550 have different maintenance and flight manuals. Creating a common type GV-SP/G500/G550 will enable NAA to ensure that G500 and G550 are taught in a GV-SP training session.	

Paragraph - **Add. info:** Appendix I -§12 Helicopters with turbine engines, eligible to type examinations and group ratings

Cmt. *GSAC*	
Replace 'Eurocopter AS 332/332L/ L1 (Turbomeca Makila)' by 'Eurocopter AS 332/332L/ L1 (Turbomeca Makila 1A)'	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. *GSAC*	
Replace “Eurocopter AS 332 L2 (Turbomeca Makila)” by 'Eurocopter AS 332 L2 (Turbomeca Makila 2A)'	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. *GSAC*	
Replace “Eurocopter AS 355 (Turbomeca Arrius)” by “Eurocopter AS 355 (Turbomeca Arrius 1) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	

Comment	Response
Cmt. ***GSAC***	
Replace “Eurocopter AS 365 N (Turbomeca Arriel)” by “Eurocopter AS 365 N (Turbomeca Arriel 1) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. ***GSAC***	
Replace “Eurocopter BK 117 C-2 (Turbomeca Arriel)” by “Eurocopter BK 117 C-2 (Turbomeca Arriel 1) “	Partially accepted. Designation MBB has also been added.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. ***GSAC***	
Replace “Eurocopter EC 135(Turbomeca Arrius)” by “Eurocopter EC 135 (Turbomeca Arrius 2B) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. ***GSAC***	
Replace “Eurocopter EC155(Turbomeca Arriel)” by “Eurocopter EC 155 (Turbomeca Arriel 2) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. ***GSAC***	
Replace “Eurocopter EC 225(Turbomeca Makila)” by “Eurocopter EC 225 (Turbomeca Makila 2A) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	
Cmt. ***GSAC***	
Replace “Eurocopter EC 120 (Turbomeca Arrius)” by “Eurocopter EC 120 (Turbomeca Arrius 2 F) “	Accepted.
Justification	
Standardization of Turbomeca engines designation (refer to Turbomeca Part 147 approval FR.147.0022)	

Comment	Response
Cmt. ***GSAC***	
Replace “Eurocopter SA 315 (Turbomeca Arouste)” by “Eurocopter SA 315 (Turbomeca Arouste III B) “	Accepted.
Justification	
Standardization of Turbomeca engines designations.	
Cmt. ***GSAC***	
Appendix I -§12 Helicopters with turbine engines, eligible to type examinations and group ratings Replace “Eurocopter SA 319 (Turbomeca Arouste)” by “Eurocopter SA 319 (Turbomeca Astazou XIV B) “	Accepted.
Justification	
As written in the DGAC TCDS n°61 Edition n°7, the engine on the SA319 is not the Artouste but the Astazou.	
Cmt. ***GSAC***	
Delete “Aérospatiale SA 341G/J “Gazelle” (Turbomeca Astazou III A)” and replace by 2 separate types: “Eurocopter SA 341 G (Turboméca Astazou III A)” “Eurocopter SA 342 J (Turboméca Astazou XIV H)”	Accepted.
Justification	
As written in the DGAC TCDS N° 136 Edition n°4: 1. the certificate holder is Eurocopter since january 1992. The “Gazelle” is a commercial designation which shouldn’t be put in an aircraft type, otherwise we have to put every the commercial designation as “Colibri” on the EC 120; “ecureuil” on the AS 350 and EC 130. 2. the SA 341 J doesn’t exist, it is the SA 342 J.	
Cmt. ***GSAC***	
Replace “Eurocopter AS 350 (Turbomeca Arriel)” by 2 types: “Eurocopter AS 350 (Turbomeca Arriel 1) “ “Eurocopter AS350 (Turbomeca Arriel 2)”	Accepted.
Justification	
As written in the DGAC TCDS n°157 Edition n°15, the AS350 can be equipped either with a Arriel 1 or with a Arriel 2: these engines are not the same (refer to Turbomeca Part 147 scope of approval FR.147.0022)	
Cmt. ***GSAC***	
Delete “Aérospatiale SA 360 (Turbomeca Astazou XVIII A)” and replace by 'Eurocopter SA 360 (Turbomeca Astazou XVIII A)'	Accepted.
Justification	
As written in the DGAC TCDS N° 153 Edition n°3, the certificate holder is Eurocopter since january 1992.	

Comment	Response
Cmt. *GSAC*	
Replace “Aérospatiale SA 3130 Alouette II “Artouste” (Turbomeca Artouste II B1/C/C5/C6)” by “Eurocopter SE 3130 (Turboméca Artouste II C)	Accepted.
Justification	
As written in the DGAC TCDS N° 24 Edition n°9, the certificate holder is Eurocopter since January 1992. The engine designation should be in compliance with the approved scope of Turbomeca Part 147 (see FR.147.0022). The “Alouette II” is a commercial designation which shouldn’t be put in an aircraft type, otherwise we have to put every commercial designation as “Colibri” on the EC 120; “ecureuil” on the AS 350 and EC 130.	
Cmt. *GSAC*	
Delete “Aérospatiale SE 3160 “Alouette III” (Turbomeca Arouste III B)” and replace by “ Eurocopter SE 3160 (Turbomeca Arouste III B) “	Accepted.
Justification	
As written in the DGAC TCDS N° 61 Edition n°7, the certificate holder is Eurocopter since january 1992. The “Alouette III” is a commercial designation which shouldn’t be put in an aircraft type, otherwise we have to put every commercial designation as “Colibri” on the EC 120; “Ecureuil” on the AS 350 and EC 130.	
Cmt. *GSAC*	
Replace “Aérospatiale SA 3180 Alouette II “Astazou” (Turbomeca Astazou II A)” by “ Eurocopter SA 3180 (Turboméca Astazou II A)	Accepted.
Justification	
As written in the DGAC TCDS N° 24 Edition n°9, the certificate holder is Eurocopter since january 1992. The engine designation should be in compliance with the approved scope of Turbomeca Part 147 (see FR.147.0022). The “Alouette II” is a commercial designation which shouldn’t be put in an aircraft type, otherwise we have to put every commercial designation as “Colibri” on the EC 120; “ecureuil” on the AS 350 and EC 130.	

Comment	Response

Paragraph - **Add. info:** Appendix I, table 11 on page 13.

Cmt. *Eurocopter Deutschland*

a. We have realized that our helicopters BO105 and EC135, which are certified as part 27 (normal or small) multi-engine helicopters, are listed in the table 11 of large helicopters. We kindly ask for clarification why. B. There are several duplications on the designations of our products, such as the designation “Eurocopter BK117C-2”, “MBB-BK117 C2” or “EC145”. The same situation is also valid for our product BO-105 Proposed modifications and proposed deletions DELETE <<Eurocopter BK 117 C-2 (Turbomeca Arriel)>> Eurocopter BO 105 Series (Rolls-Royce Corporation 250) Eurocopter EC 135 (Turbomeca Arrius) Eurocopter EC 135 (PW 206) DELETE << Eurocopter MBB 105 (Rolls-Royce Corporation 250) Eurocopter MBB BK 117 (Turbomeca Arriel) Eurocopter MBB BK 117 (Lycoming LTS 101) >> <<ADD>> <<Eurocopter MBB-BK 117 A-1/-3/-4/-B-1/-2 (LTS 101-650/-750-B1) Eurocopter MBB-BK 117 C-1 (Turbomeca Arriel 1E2) Eurocopter MBB-BK 117 C-2 / EC 145 (Turbomeca Arriel 1E2)>>	Accepted. The title of table 11 has been changed to multi-engine helicopters.

Justification

The same designations used in the type certificate and in its type certificate data sheets shall also be used in the table of this appendix I, just behind the company name “ Eurocopter”, as they are the officially released designations by the certificating authority.

Paragraph - **Add. info:** Draft Decision “APPENDIX I AIRCRAFT TYPE RATINGS FOR PART-66 AIRCRAFT MAINTENANCE LICENCE” List 1 Large Aircraft

Cmt. *Lufthansa*

Delete “A340 (RR Trent 500)” and keep only A340 (RR RB211)	Partially accepted. The type A340 (RR Trent 500) has been kept and A340 (RR RB211) has been deleted.

Justification

The list includes a new type: A340 (RR Trent 500), additionally to A340 (RR RB211).
This is doubled: Both are referred to A340-600 which is exclusively equipped with Trent 500.

Comment	Response

Paragraph - **Add. info:** NPA No.13-2005, Annex I, Appendix 1, 11: Large Helicopters. Multi-Engine

Cmt. ***CAA, UK***

Change AS365 series to read: Eurocopter AS365 C (Turbomecca Arriel) Eurocopter AS365N (Turbomecca Arriel)	Not accepted. Please refer to comment from Eurocopter.

Justification

Use of correct name and standardisation with other Helicopters with Arriel engines.

Paragraph - **Add. info:** NPA No.13-2005, Annex I, Appendix I, 1.Large Aircraft

Cmt. ***CAA, UK***

Delete EITHER Airbus A340 (RR RB211) OR Airbus A340 (RR Trent 500)	Accepted. Airbus A340 (RR RB211) has been deleted.

Justification

Same Aircraft/Engine combination.

Paragraph - **Add. info:** NPA-13-2005 Annex I, Appendix I: 11. Large Helicopters, Multi-Engine

Cmt. ***CAA, UK***

Change S76 list to read: S76A (Rolls Royce Corporation 250) S76A (Turbomecca Arriel) S76C (Turbomecca Arriel) S76B (PWC PT6)	Accepted.

Justification

Use of correct name and Technical Specification

Paragraph - **Add. info:** NPA-13-2005 Annex I, Appendix I: 3. Multiple Turbine aircraft below 5700 kg

Cmt. ***CAA, UK***

Remove De Havilland DH6 'Twin Otter' (PWC PT6)	Accepted.

Justification

Duplication of Bombardier DHC 6 – (PWC PT6) aircraft type

Paragraph - **Add. info:** NPA-13-2005 Annex I, Appendix I: 2. Twin Turbine engine aircraft below 5700 kg

Cmt. ***CAA, UK***

Add Piper PA42 (PWC PT6) aircraft type	Noted. Type is already included.

Justification

Missing Type Rating

Comment	Response

Paragraph - **Add. info:** NPA-13-2005, Annex I, Appendix I, 1. Large Aircraft

Cmt. ***CAA, UK***

For BAe Jetstream 3100 (Honeywell TPE331) read BAe Jetstream 31/32 (Honeywell TPE331) For BAe Jetstream 4100 (Honeywell TPE331) read BAe Jetstream 41 (Honeywell TPE331) Delete from list BAe Jetstream 31/32/41 (Honeywell TPE331)	Accepted.

Justification

3100 & 4100 are the same as 31 & 41. Jetstream 41 is a different technology to 31.

Cmt. ***CAA, UK***

Junkers JU52 (PW R1340) should not be included	Accepted.

Justification

Should be designated as Annex 2 Aircraft type

Cmt. ***CAA, UK***

Junkers JU52 (BMW 132) should not be included	Accepted.

Justification

Should be designated as Annex 2 Aircraft type

Cmt. ***CAA, UK***

Convair 240/340/440 (PW R2800) should not be included	Partially accepted. The TC for Convair CV-440 has been transferred to EASA.

Justification

Should be designated as Annex 2 Aircraft type

Cmt. ***CAA, UK***

Consolidated PBY-5A (PW R1830) should not be included	Accepted.

Justification

Should be designated as Annex 2 Aircraft type

Cmt. ***CAA, UK***

Gulfstream V (RRD BR 710) & Gulfstream VSP (RRD BR710) combine into series aircraft	Not accepted. Please refer to comment from GSAC.

Justification

Aircraft on EASA Aircraft Type Rating List

Comment	Response
Cmt. *CAA, UK*	
Bae 1000 (PW PLU 305) and Bae/Hawker 125 (PW305) - same type	Accepted.
Justification	
Duplication of aircraft type	

Paragraph - **Add. info:** NPA-13-2005, Annex I, Appendix I: 1. Large Aircraft

Comment	Response
Cmt. *CAA, UK*	
De Havilland DH114 (DH Gipsy Queen) should not be included	Accepted.
Justification	
Should be designated as Annex 2 Aircraft type	

Paragraph - **Add. info:** NPA-13-2005, Annex I, Appendix I: 11.Multi Engine Helicopters

Comment	Response
Cmt. *CAA, UK*	
Delete Eurocopter MBB 105 (Rolls Royce Corporation 250)	Accepted.
Justification	
Same Aircraft as Eurocopter BO 105 (Rolls Royce Corporation 250)	

Paragraph - **Add. info:** NPA-13-2005, Annex I, Appendix I: 6. Aeroplane Single Piston-Metal

Comment	Response
Cmt. *CAA, UK*	
Add Piper PA28 Series (TAE 125-01)	Accepted.
Justification	
Missing Aircraft Type Rating	

Comment	Response
General Comments	
Paragraph - **Add. info:**	
Cmt. *DGAC, France*	
The table should be presented in 5 columns: 1. Type certificate holder 2. Aircraft type 3. Aircraft model (as it appears on the TC and/or TCDS) 4. Aircraft variant, if such subdivision is necessary within a model 5. Type Rating designation to be endorsed on the license	Noted. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. You could propose an amendment to Part-66 AMC using the form on the EASA website explaining the proposal further and expanding on the justification. It will then be processed by EASA. The issue could also be addressed by task 66.009.
Justification	
More user friendly, avoid confusion between designations for type certification and designation for license endorsement.	
Cmt. *DGAC, France*	
Harmonise designations for license endorsement and designations for Part 147 approvals	Noted. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. You could propose an amendment to Part-66/-147 AMC using the form on the EASA website explaining the proposal further and expanding on the justification. It will then be processed by EASA. The issue could also be addressed by task 66.009.
Justification	
Some of the designations given in the proposed list are not consistent with the scope of approval given in Part 147 approvals. They should be consistent in order to clearly know what Type Rating may be endorsed after Part 147 training.	

Comment	Response
Cmt. *DGAC, France* A simple updating of the list, adding some aircraft, or changing the name of the TC holder, does not seem sufficient. There is a need for a global and thorough work on the principles of type ratings. Principles similar to those used in Flight Crew Licensing, with types, models, variants, would probably have some merit. The classification should address: - Aircraft class grouping different aircraft type of similar technology when a common training is possible (such as wooden structure vs composite for example) - Aircraft groups for different types of the same manufacturer - Aircraft types within the same TC - Aircraft models with different designations within the same TC - Aircraft variants within the same model but with notable differences (including significant STC) The regulation should clearly define: - at which level the rating is required - If different ratings are required within the same category, whether adding a new rating in the same category requires complete training or additional training. - When the same rating includes different sub-categories, the regulation (including Part M and Part 145) should specify the conditions for the AME to sign CRS on a sub-category which was not included in the initial training. For example, for large aeroplane, if we consider the B737 models 300, 400 and 500 it appears that there exist a common basis but there is a need for training on particularities of each model, the different solutions may be: 1. Initial training on B737-300, 400 and 500 and endorsement of a B737-300/400/500 rating 2. Initial training on one of the model and endorsement of that model only B737/300, B737/400 or B737/500 and complementary training to add another model on the rating 3. Initial training on one of the model but endorsement of the complete rating B737-300/400/500 but with certifying privileges limited to the model trained and extension of the privileges with complementary training. In addition there may be a need to address differences training (which could be self training) within the same model in Part M and Part 145 (which may also need to address more clearly recurrent training and recency for different sub-categories within the same rating or with different ratings within the same category) As Part M impact assessment has proven, these questions are particularly critical for small aviation which, compared to large commercial air transport aviation, has to face: - larger number of aircraft types - some types being limited to a small number of individual aircraft - limited number of flight hours and thus limited need for maintenance - generally similar non complex technology - limited support (or even no support) from TC holder and no approved training organisations fro a number of these aircraft expertise which often appears more linked to the technology (for example wooden or composite structure) than to the aircraft type	Noted. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. The issue should be addressed by task 66.009 that will be expanded to cover type rating issues in general.
Justification For a mechanic changing form a B737 to A320, changing from B737-300 to B737-400 or changing from one B-737-300 to another B-737-300 with a specific significant STC are 3 different situations which should be taken into account.	

Comment	Response
The different lists for small aircraft do not appear consistent. More generally the rationale for including different aircraft within a same rating or different ratings and for including a rating in on list rather than another are not clear at all	
Cmt. ***DGAC, France***	
Designation of aircraft type is not consistent throughout the list. Some use the name of the existing TC holder (Allied changed to Honeywell), some use the name of the initial manufacturer (McD MD80), some use commercial designations (SA 3130 Alouette II) some don't (AS 332). We propose to use existing TC holder and TC reference for aircraft designation and, if this is considered useful for the user, to add between brackets initial manufacturer name and aircraft commercial name (between inverted commas)	Noted. EASA is studying the issue at the moment. The designation may be changed with the next amendment in 4 months. Nonetheless, this NPA is seen as improvement as the existing list is already three years old.
Justification	
The aircraft should be designated by their official reference in the TC documents.	
Cmt. ***DGAC, France***	
When different models are included in the same rating, it is not clear whether the Part 147 organisation has to cover all the models. This may prove difficult especially for Part 147 attached to an operator which does not operate all of the models	Noted. The Part-147 rating should be linked to the Part-66 rating. The objective of this NPA is to update a rather outdated list but not to change the policy. That's why we have an accelerated rulemaking process on this task. The changes you propose would need proper consultation. You could propose an amendment to Part-66/-147 AMC using the form on the EASA website explaining the proposal further and expanding on the justification. It will then be processed by EASA. The issue could also be addressed by task 66.009.
Justification	
Links between Part 66 and Part 147.	
Cmt. ***FAA***	
No comments	Noted.
Justification	

Comment	Response

Paragraph - **Add. info:** Appendix 1 / paragraph 1 (large aircraft)

Cmt. *Flilghtsafety*

Instead of : Dassault Falcon 50 (Honeywell TFE731) write: - Dassault Falcon 50 B (Honeywell TFE731) - Dassault Falcon 50EX (Honeywell TFE731)	Accepted.

Justification

With the “Dassault Falcon 50 (Honeywell TFE731) “ definition, a technician working on only one of the 2 models must attend 2 different courses for the type rating.
With a more detailed definition, a technician working for an operator with only one of the 2 models will have to attend only one course.