

| # | Para | Comment Provider | Comment/Justification | Response | Resulting Text |
|---|------------------------------------|------------------|--|--------------|--|
| | AMC M.A.305(d)4 and AMC M.A.305(h) | IASL | What does service life-limited components mean? Service-life-limited or service life limited is better. Or service-life limited is still better. But service life-limited has no meaning. | Noted | No Changes. AMC M.A.305(d)4 and AMC M.A.305(h) specifies service life-limited as (i) certified life limit, i.e. to be retired and (ii) service life limit, i.e. require maintenance to restore serviceability |
| | AMC M.A.501(a)5 | IASL | Add 'Add ARC issued by an organisation approved by NAA of a country acceptable to CAA' to allow operators to source components where EASA, FAA or TCCA certification is not available. | Not Accepted | No Changes. Form 1s of State from which we have accepted a type certificate will be accepted. Other Form 1s will not be accepted. This is to create consistency and encourage a level playing field. |
| | AMC M.A.606(b) | IASL | Editorial comments - 'in this Regulations' should be 'in this Regulation' | Accepted | "in this Regulation" |
| | M.A.202(a) | IASL | Editorial comments - Reference to point M.A.201, suggest to write MCAR-M.A.201 or AMC M.A.201, whichever it is referring to. | Noted | No Changes. M.A.201 refers to both the the requirement and its AMC. |
| | M.A.304 | IASL | CAA has indicated that it does not have the capability to assess modifications and repairs. The current practice is to obtain approval from a design organisation and in most cases directly from the TC holder. This practice will only lead to administrative delays in the approval process. We would like to keep EASA wording and allow CAMO to obtain approval from an acceptable design organisation. | Noted | No Changes. Standard Repairs/Changes are not included in the current regulations and thus this would not change the current requirements or procedures. |
| | M.A.305(f) | IASL | Editorial comments - Reference to M.A. Subpart B, suggest to write MCAR or AMC, whichever it is referring to. | Noted | No Changes. M.A. Subpart B refers to both the requirement and the AMC/GM |
| | M.A.402(a)2 | IASL | Editorial comments - Reference to Appendix VIII of MCAR-M, suggest to write MCAR or AMC, whichever it is referring to. | Noted | No Changes. Such references refer to both the requirement and the AMC/GM |
| | M.A.501(a) | IASL | Editorial comments - 'on an CAA Form 1' should be 'on a CAA Form 1' | Accepted | M.A.501(a), AMC M.A.602, AMC M.A.613(a)2 and AMC M.A.802 changed to "on a CAA Form" |
| | M.A.712(d) | IASL | Editorial comments - 'approved in accordance with another civil aviation regulation'. This is very unclear. Need revising. 1. It should be "other regulations", other is specific 2. What OTHER? If ANOTHER means regulations excluding Part M and OTHERS will include all except that ANOTHER including Part M | Accepted | M.A.712(d) changed to "approved in accordance with another MCAR" |

M Mega NPRM 2015-2, under the heading "Background to Proposal" states that changes include Incorporation of EU No. 593/2012 and ED Decision 2012/004/R. This means we will not be incorporating changes to EASA Part-M made in year 2013 and 2014. No need to keep the regulations too old (three years old as this is year 2015) compared to the main source. Therefore, I would suggest incorporating,

1. Commission Regulation (EU) No 1321/2014 of 26 November 2014
2. Part-M / AMC Amendment 9 / GM Amendment 3 (Part-M / AMC Amendment 9 / GM Amendment 3)
3. Part-M / AMC Amendment 10 (ED Decision 2013/025/R)
4. Part-M / AMC Amendment 11 (ED Decision 2013/034/R)

I believe this will also align our regulations to EASA FAQs available of Part-M, Part-145, Part-66. The FAQs are updated on 15th Dec 2014 and provide good insight.
Note: EU No. 593/2012 is already repealed as per EASA website

Partially Accepted List of Amendments will be changed to "incorporation of EU No. 593/2012 and ED Decision 2013/034/R".

Industry view was not to incorporated 1321/2014. AMCs incorporated.

AMC Amendment 9 - Section B ACAM
AMC Amendment 10 - Piston engine overhauls and AMPs
AMC Amendment 11 - Cancelled AMC Amendment 10

1321/2014 - Changes to Form 1 Block 11 Status/Work

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| M.A.302(d)(ii) | TMA | For instruction for continuing airworthiness for maintenance program, propose to add LSTC in addition to TC, restricted type-certificate, STC, major repair etc. | Noted | No Changes This is possible through the MCAR-21 change process |
| M.A.304(b) | TMA | For data approved by CAA in accordance with MCAR 21, propose to add approved by manufacturer of aircraft, components or parts in addition to MCAR-21. | Noted | No Changes This is possible through the MCAR-21 change process |
| M.A.501(a)5 | TMA | Propose to add one more point in para 5 for CAA Form 1 equivalent document " a release documents issued under the competent authority acceptable to CAA." | Not Accepted | No Changes. Form 1s of State from which we have accepted a type certificate will be accepted. Other Form 1s will not be accepted. This is to create consistency and encourage a level playing field. |
| M.A.501(a)6 | TMA | All items installed do not have CAA form 1s. Hence, it may be worth narrowing it down to components and parts only instead of referring to all items. | Noted | No Changes. M.A.501(a) refers to components and hence the AMC is applicable to components. |
| M.A.707(b) | TMA | Requirement for a/w review staff, MCAR-66 license or relevant engineering degree. What are the relevant engineering degree acceptable to CAA? | Partially Accepted | The qualification process will be aligned with SARI Part M. Should an urgent need arise the CAA may issue an exemption within the scope of EASA Part M. |
| TOC | TMA | Editorial comments - Missing headings on pages xi and xii | Accepted | All headings and page numbers will be corrected prior to promulgation. |

Terminology

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| Accepted | The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text |
| Partially accepted | The CAA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text. |
| Noted | The CAA acknowledges the comment but no change to the existing text is considered necessary. |
| Not Accepted | The comment or proposed amendment is not shared by the CAA. |