

## Comments Response Document for NPRM 2007-05 "Maintenance Personnel Duty Time Limitations"

No.	Received Date	ASC Ref	Comments/Justification	Organisation	CAD Response	Resulting Text
1	1-Feb-08	General	<p>1. Change the effective date of the circular to 1st January 2010 to enable the AMO to restructure staff deployment. We request the change because we do not have sufficient certifying staff.</p> <p>2. This is aggravated partly by the lack of a published schedule by CAD for examining potential candidates for issuance of AML</p>	AMO 1	<p>1.Organisation to provide statistical data to demonstrate lack of certifying staff.</p> <p>2.CAD conducts AME exams bi-annually and also oral exams are conducted under ASC AW-15 upon request. Hence, comment doe not reflect actual practice.</p>	No changes to text

2	7-Feb-08	5.5, 5.7	<p>1. Section 5.5: Night shift limitations para. (a) A limit of 50 hours of work over 5 days is more acceptable to us.</p> <p>2. Section 5.5: Night shift limitations para. (b) (statement from NPRM) and this shall be increased to 3 successive rest days (i.e. 83 hours off) if the preceding span of night shifts exceeds 3 (or 36 hours of work). This is not acceptable I feel that 59 hours of continuous rest whether night or day duty is more than adequate. However I propose that a longer rest period may be required during the transition from night shift to a day shift. In this case a 72 hour rest period may be acceptable.</p> <p>3. Section 5.7: Notice of schedule the 28 days to be reduced to 7 days.</p>	AMO 2	<p>1. Para 5.5(a) gives several options to the organisation. However, the span of night shifts will only allow 48 hours maximum (under option &gt; up to 8 hour shifts).</p> <p>2. Following changes will be made.</p> <p>* After a span of night shifts, 2 days rest (59 hours off) shall be given if next span of shifts are also night shifts.</p> <p>*However, when span of night shifts exceed 3 and next span of shifts are day shifts, 3 days rest (83 hours) shall be given.</p> <p>3. 28 days will be reduced to 7 days.</p>	<p>5.5 (b): ... and this shall be increased to 3 successive rest days (i.e. 83 hours off) if the preceding span of night shifts exceeds 3 (or 36 hours of work) and the next scheduled shift is not a night shift.</p> <p>5.7 (a): ... shall be given at least 7 days' notice of their work schedule.</p>
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3	31-Jan-08	5.3, 5.6(a)	<p>1. We need to establish nett or gross working hours applies, i.e incl/excl breaks.</p> <p>2. {5.3} Weekly working hours limit is not acceptable and requires discussion to improve.</p> <p>3. {5.6 a} Our scheduled morning shift starts before 0600 hours due operational requirements as VFR - operator</p> <p>4. {6} Not acceptable, this requires further discussion to improve</p>	AMO 3	<p>3. Para 5.6(a) will be changed to a recommendation. Also, in Para 5.6(b), number of successive shifts will be increased from 4 to 5.</p> <p>A letter has been sent to AMO 3 on 10 Feb 08, requesting for clarification on other comments. However, to date CAD has not received a reply.</p>	<p>5.6(a) - Recommendation</p> <p>5.6(b) - ..... shall be limited to 5, immediately ....</p>
4	25-Dec-07	5.4	<p>1. Working hours 8-10 hrs better</p> <p>2. Two days off highly appreciated</p> <p>3. Annual leave per year 30 days</p>	Individual # 1	<p>The requirements are flexible enough to allow 8-10 hrs per day and 2 days off per week.</p> <p>Annual leave of 21 days (normally 28 days) is at the discretion of the operator.</p>	No changes to text
5	25-Dec-07	General	<p>1. If effectivity date was advanced</p> <p>2. If two days off per week is made mandatory</p>	Individual # 2	<p>1. Operator needs sufficient time to implement the requirements.</p> <p>2. See Comment 4</p>	No changes to text

6	25-Dec-07	General	<p>1. Working time must not exceed 10 hrs</p> <p>2. Two days off is very appreciated</p> <p>3. This NPRM can make effective in an earlier date</p>	Individual # 3	See Comment 4 and 5	No changes to text
7	25-Dec-07	General	<p>1. I would highly recommend to make this NPRM No. 2007-05 ASC 00-1 Effective in mid 2008</p> <p>2. Recommend to make mandatory to give 2 days OFF per week to engineers</p>	Individual # 4	See Comment 4 and 5	No changes to text
8	25-Dec-07	General	<p>1. Working hours should not exceed more than 8 hrs</p> <p>2. Two days OFF will be appreciated</p> <p>3. If effectivity date was advanced</p>	Individual # 5	See Comment 4 and 5	No changes to text
9	25-Dec-07	General	<p>1. Scheduled Shift not to exceed 8 hrs</p> <p>2. 2 days off per week mandatory</p> <p>3. Effective date to be advanced to mid 2008 if possible</p>	Individual # 6	See Comment 4 and 5	No changes to text
10	25-Dec-07	General	<p>1. I would highly recommend to make this NPRM No. 2007-05, ASC 00-1 effective in mid 2008</p> <p>2. Recommend to make mandatory to give 2 days OFF for all maintenance personnel</p>	Individual # 7	See Comment 4 and 5	No changes to text

11	25-Dec-07	General	<p>1. Any shift should not exceed more than 8 hrs</p> <p>2. Minimum 2 days off per week</p> <p>3. Effectivity to be advanced to mid 2008 or sooner</p>	Individual # 8	See Comment 4 and 5	No changes to text
12	25-Dec-07	General	<p>1. Scheduled shift shall not exceed 8-10 hrs</p> <p>2. "work-sleep-work" philosophy shall not be practical in aviation + this is 21st century! Family and work shall be balanced 2 days off is very welcoming</p>	Individual # 9	See Comment 4 and 5	No changes to text
13	25-Dec-07	General	<p>1. scheduled shift shall not exceed 8-10 hrs</p> <p>2. work-sleep-work' philosophy shall not be practical in aviation + this is 21st century! And we are moving in the right direction! (Family and work shall be balanced) - 2 days off is very welcoming</p> <p>3. This NPRM effective date can be made to an early date ( as early as possible )</p>	Individual # 10	See Comment 4 and 5	No changes to text

14	25-Dec-07	General	<ol style="list-style-type: none"> <li>1. Working 12 hrs continuously is too long - better make it 10 hrs</li> <li>2. Two days off is highly appreciated</li> <li>3. Better make this NPRM effective in an early date ( mid 2008 is reasonably enough time)</li> <li>4. Four days 'ON' and four days 'OFF' is what is recommended</li> </ol>	Individual # 11	See Comment 4 and 54. The hu	No changes to text
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15	30-Dec-07	4, 5.2, 5.9	<p>1. I did very much like definition by the IFA on their Guidance Information for the Establishment of Duty Time Limitations and Rest Periods. They define " Maintenance Person" as a person engaged in maintenance, repair and overhaul of commercial aircraft regardless of qualification or employer. This includes person employed in the preparation of maintenance instructions and tasks. I must admit CAD's definition is very specific.</p> <p>2. With respect to ASC-001, para 5.2, I think its important to define the maximum hours without a schedule break under the daily working hour limits</p> <p>3. Under "Records - these information are normally reflected on AMO's company procedures and SMS documentation." Why not change it to 'Records and documentation' and include : © Ensure that duty time limitations as per the circular are in detailed in the company procedures and SMS documentation.</p>	Individual # 12	<p>1. CAD would like to make it very clear, to whom this ASC is applicable.</p> <p>2. If it is defined with out a scheduled break, stakeholders may interpret it in a manner which is against the spirit of this circular.</p> <p>3. CAD is of the opinion that it is an administrative/HR task to maintain the records and hence may not be appropriate to bring this under MOE.</p>	No changes to text
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16	31-Dec-07	4	<ol style="list-style-type: none"> <li>1. This should define the workign hours like - ferry to time of punching out</li> <li>2. we must be able to get two days OFF per week</li> <li>3. This should be implemented as soon as possible</li> </ol>	Individual # 13	<ol style="list-style-type: none"> <li>1. Comment too specific to be included in the circular. This is at the discretion of the operator.</li> </ol> <p>See Comment 4 and 5</p>	No changes to text
17	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be implemented as soon as possible</li> <li>2. We should get two days OFF per week</li> <li>3. Working hours must be defined</li> </ol>	Individual # 14	<ol style="list-style-type: none"> <li>3. Definition given under Para 4 of ASC</li> </ol>	No changes to text
18	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This will be good if you have defined the working hours like ferry to time of punching out</li> <li>2. We shall be able to get two days OFF/ week</li> <li>3. This should be in action as soon as possible</li> </ol>	Individual # 15	See Comment 4 and 5	No changes to text
19	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Defined working hours commencing time and ending (Ferry to punching out time)</li> <li>2. We should get two days OFF</li> <li>3. Should be implemented as soon as possible</li> </ol>	Individual # 16	See Comment 4, 5 and 16	No changes to text



20	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Must be able to get more day OFF per week</li> <li>2. Working hours should be defined</li> <li>3. This must be in action soon</li> </ol>	Individual # 17	See Comment 4, 5 and 17	No changes to text
21	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Working hours must be defined</li> <li>2. This has to be in action soon</li> <li>3. Must be able to get two days off per week</li> </ol>	Individual # 18	See Comment 4, 5 and 17	No changes to text
22	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be implemented ASAP</li> <li>2. Should be able to get two days OFF per week</li> <li>3. Working hours must be defined</li> </ol>	Individual # 19	See Comment 4, 5 and 17	No changes to text
23	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Do define the working hours (ferry to time of punching out)</li> <li>2. We must be able to get two days OFF</li> <li>3. This has to be in action as soon as possible</li> </ol>	Individual # 20	See Comment 4, 5 and 16	No changes to text

24	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This should be in action with this changes soon</li> <li>2. We must be able to get tow days OFF</li> <li>3. Working Hours should be defined</li> </ol>	Individual # 21	See Comment 4, 5 and 17	No changes to text
25	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Need more day OFF/ week</li> <li>2. working hours should be defined</li> <li>3. This must be implemented soon</li> </ol>	Individual # 22	See Comment 4, 5 and 17	No changes to text
26	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Please do implement this as soon as possible</li> <li>2. Must be able to get more days OFF</li> <li>3. Please do define the working hours</li> </ol>	Individual # 23	See Comment 4, 5 and 17	No changes to text
27	31-Dec-07	General	<p>Please add these points</p> <ol style="list-style-type: none"> <li>1. We should be able to get two day OFF pwer week</li> <li>2. Our working hours should be defined</li> <li>3. Please do implement this soon</li> </ol>	Individual # 24	See Comment 4, 5 and 17	No changes to text

28	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This should be implemented as soon as possible</li> <li>2. Working hours should be defined</li> <li>3. Must be able to get more day OFF/ week</li> </ol>	Individual # 25	See Comment 4, 5 and 17	No changes to text
29	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This has to implement as soon as possible</li> <li>2. Must be able to get two days OFF</li> <li>3. working time has to be defined</li> </ol>	Individual # 26	See Comment 4, 5 and 17	No changes to text
30	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be in action with these points as soon as possible</li> <li>2. We must be able to get two days OFF/week</li> <li>3. Working hours should be defined</li> <li>4. There are some guys who come to work from Vilingili &amp; Hulhumale'. Therefore the workign hours should be defined (like ferry to time of punching out)</li> </ol>	Individual # 27	See Comment 4, 5, 16 and 17	No changes to text
31	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. We must be able to get two days OFF/ week</li> <li>2. This must be in action as soon as possible</li> <li>3. Working hours should be defined</li> </ol>	Individual # 28	See Comment 4, 5 and 17	No changes to text

32	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Must get two days off in a week</li> <li>2. Working hours should be defined</li> <li>3. This must be in action as soon as possible</li> </ol>	Individual # 29	See Comment 4, 5 and 17	No changes to text
33	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. We should get two days off</li> <li>2. Working hours should be defined</li> <li>3. This must be in action as soon as possible</li> </ol>	Individual # 30	See Comment 4, 5 and 17	No changes to text
34	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be implemented as soon as possible</li> <li>2. Working hours should be defined</li> <li>3. We should be able to get two days OFF/week</li> </ol>	Individual # 31	See Comment 4, 5 and 17	No changes to text
35	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. We must be able to get two days OFF</li> <li>2. Working hours should be defined like ferry to punching out time</li> <li>3. This should be implemented now</li> </ol>	Individual # 32	See Comment 4, 5 and 17	No changes to text
36	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This should be implemented now</li> <li>2. We must be able to get two days OFF/week</li> <li>3. Working hours should be defined (like ferry to punching out)</li> </ol>	Individual # 33	See Comment 4, 5 and 17	No changes to text

37	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. Must have defined working hours (like ferry to time of punching out)</li> <li>2. We should get 2 days OFF/week. This must be in action as soon as possible.</li> </ol>	Individual # 34	See Comment 4, 5, 16 and 17	No changes to text
38	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. We should get more day off/week</li> <li>2. This must be implemented as soon as possible</li> <li>3. Should have less working hours/day</li> </ol>	Individual # 35	See Comment 4 and 5	No changes to text
39	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be implemented in next year</li> <li>2. We must get two days off and working hours must be defined</li> </ol>	Individual # 36	See Comment 4, 5, and 17	No changes to text
40	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. This must be implemented as soon as possible</li> <li>2. We must get two days OFF/week</li> <li>3. Working hours should be defined</li> </ol>	Individual # 37	See Comment 4, 5, and 17	No changes to text
41	31-Dec-07	General	<ol style="list-style-type: none"> <li>1. We should be able to get two days OFF/week</li> <li>2. Working hours should be defined</li> <li>3. This should be implemented as soon as possible</li> </ol>	Individual # 38	See Comment 4, 5, and 17	No changes to text

42	31-Dec-07	General	<p>1. We must be able to get two days OFF/week</p> <p>2. Working hours should be defined (ferry to punching out)</p> <p>3. This should be implemented as soon as possible</p>	Individual # 39	See Comment 4, 5, 16 and 17	No changes to text
43	31-Dec-07	General	<p>1. Should implement this soon</p> <p>2. Please do define working hours</p> <p>3. We must get two days OFF/week</p>	Individual # 40	See Comment 4, 5, and 17	No changes to text
44	31-Dec-07	General	The Proposal is acceptable without change	Individual # 41	See Comment 4, 5, and 17	No changes to text
45	31-Dec-07	General	The Proposal is acceptable without change	Individual # 42	See Comment 4, 5, and 17	No changes to text
46	31-Dec-07	General	The Proposal is acceptable without change	Individual # 43	See Comment 4, 5, and 17	No changes to text
47	31-Dec-07	General	The Proposal is acceptable without change	Individual # 44	See Comment 4, 5, and 17	No changes to text
48	31-Dec-07	General	The Proposal is acceptable without change	Individual # 45	See Comment 4, 5, and 17	No changes to text