

EASA

Comment Response Tool

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Title	Critical Tasks
NPA Number	NPA 2012-04

UK CAA (European.Affairs@caa.co.uk) has placed **15** unique comments on this NPA:

Cmt:	Segment description	Page	Comment	Attachm
100	(General Comments)	0	<p>Page No: Not applicable - Not included in document but required to align Part M with Part 145.</p> <p>Comment: Part M.A. 202(a) Occurrence Reporting makes reference to reporting to the Member State of the Operator but Part 145.A.60(a) only makes reference to reporting to the State of Registry.</p> <p>Justification: If an aircraft is being maintained at a Part 145 organisation and the aircraft is subject to a dry leased agreement with an EU Operator, under arrangements between Member States, or another Non EU State, the Part 145 should also where applicable be reporting to the State of the Operator.</p> <p>Proposed Text: Revise Part 145.A.60(d) to add: "Where the organisation is contracted by a commercial operator to carryout maintenance, the organisation shall also report to the operator and where different from the State of Registry, the State of the Operator, any such condition affecting the operator's aircraft or component."</p>	
112	(General Comments)	0	<p>Page No: Various</p> <p>Paragraph No: Various but includes AMC M.A.402(g) and AMC3 145.A.48(b)</p> <p>Comment: The terms 'Authorised Person' and 'Independent Qualified Person' may lead to confusion.</p> <p>We would propose that reference is made to a 'First' and 'Second Independent' Inspection and then describe the qualification and experience requirements of personnel authorised to conduct the 'First' and 'Second' Inspection requirement. (Obviously a person authorised to complete the 'First Inspection' could also on a separate occasion perform the 'Second Inspection' task, whereas a person who has only been authorised to perform the 'Second inspection' is limited to that task only.)</p> <p>Justification: Particularly in the larger Part 145 organisations the 'Independent qualified person' may also be granted an authorisation covering the required privileges and consequently both persons will be authorised, albeit with different privileges.</p>	
101	B. Draft Rules - I. Draft amendment to Regulation (EC) 2042/2003	12	<p>Page No: 12 of 30</p> <p>Paragraph No: I. Draft amendment to Regulation (EC) 2042/2003 - Amend Article 2 - Definitions</p> <p>Comment: The definition as written only applies to aircraft.</p>	

			<p>Flight safety sensitive maintenance tasks may equally apply to components.</p> <p>Justification: Consistent with other paragraphs which refer to aircraft and components.</p> <p>Proposed Text: Add "... or any part on an aircraft or component that,"</p>
102	B. Draft Rules - II. Draft Opinion - Annex I: Part-M	12 - 13	<p>Page No: 13 of 30</p> <p>Paragraph No: M.A.402 e)</p> <p>Comment: Typo – "in case" is repeated.</p> <p>Justification: Typographical error.</p> <p>Proposed Text: Delete superfluous "in case".</p>
103	B. Draft Rules - II Draft Decision AMC to Part-M - AMC2 M.A.402 (g) Performance of maintenance	17 - 18	<p>Page No: 17 of 30</p> <p>Paragraph No: AMC2 M.A.402(g) Para a) 1)</p> <p>Comment: The current wording does not place the responsibility on the 'authorised person' to detail the full scope of the inspection.</p> <p>Justification: There is a need to ensure that the 'independent qualified person' referred to in Para a) 2) has a clear understanding of the tasks and areas that are to be independently inspected.</p> <p>Proposed Text: "1) The 'authorised person' assumes full responsibility for satisfactory completion of the task and must clearly identify scope of the independent inspection."</p>
104	B. Draft Rules - II Draft Decision AMC to Part-M - AMC2 M.A.402 (g) Performance of maintenance	17 - 18	<p>Page No: 17 and 18 of 30</p> <p>Paragraph No: AMC2 M.A.402(g) (b)(2)iA and paragraph iB.</p> <p>Comment: Add the word "licence" for clarity</p> <p>Justification: Clarity.</p> <p>Proposed Text: "a Part 66 licence or equivalent national licence when national regulation applies."</p>
105	B. Draft Rules - II Draft Decision AMC to Part-M - AMC2 M.A.402 (g) Performance of maintenance	17 - 18	<p>Page No: 17 of 30</p> <p>Paragraph No: AMC2 M.A.402(g) (b)(2)iA</p> <p>Comment: Whilst referencing the Part 66 licence, the required category is not clearly specified.</p> <p>Justification: For clarity add: "in any Category".</p> <p>Proposed Text: "a Part 66 licence in any Category or equivalent national licence when national regulation applies."</p>
106	B. Draft Rules - II Draft Decision AMC to Part-M - AMC2 M.A.402 (g) Performance of maintenance	17 - 18	<p>Page No: 18 of 30</p> <p>Paragraph No: AMC2 M.A.402(g) paragraph c)</p> <p>Comment: When the independent inspection reveals a defect, this should require a further re-inspection of the system and it to be reported through the internal occurrence reporting</p>

			<p>system, to ensure it is recorded and to allow further investigation if required. Therefore add an additional paragraph as bullet point 8)</p> <p>Justification: To highlight errors and latent failures and allow them to be further investigated.</p> <p>Proposed Text: "In the event that the independent inspection identifies a defect, it will be necessary to record the defect and carry out further independent inspections when appropriate rectification action has been completed. This should also be reported through the internal occurrence reporting system."</p>	
107	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC2 145.A.48 (b) Performance of maintenance	20	<p>Page No: 20 of 30</p> <p>Paragraph No: AMC2 145.A.48(b)a)1)</p> <p>Comment: Typographical error in 2nd line.</p> <p>Proposed Text: Change 'us' to 'as'.</p>	
108	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC3 145.A.48 (b) Performance of maintenance	20 - 22	<p>Page No: 20 of 30</p> <p>Paragraph No: AMC3 145.A.48 (b) paragraph c)</p> <p>Comment: When error capturing methods such as independent inspections reveal defects this should require a further re-inspection of the system, and it to be reported through the internal occurrence reporting system to ensure it is recorded, and to allow further investigation if required. Therefore add an additional paragraph as 3) at the bottom of paragraph c).</p> <p>Justification: To highlight errors and latent failures and allow them to be further investigated.</p> <p>Proposed Text: "In the event that as a result of the error capturing method used a defect is found, it will be necessary to record the defect and carry out further independent inspections when appropriate rectification action has been completed. This should also be reported through the internal occurrence reporting system."</p>	
109	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC3 145.A.48 (b) Performance of maintenance	20 - 22	<p>Page No: 20 of 30</p> <p>Paragraph No: AMC3 145.A.48 (b) paragraph c)1)i.A</p> <p>Comment: : The current wording does not place the responsibility on the 'authorised person' to detail the full scope of the inspection.</p> <p>Justification: There is a need to ensure that the 'independent qualified person' referred to in Para a) 2 has a clear understanding of the tasks and areas that are to be independently inspected.</p> <p>Proposed Text: "A . The 'authorised person' assumes full responsibility for satisfactory completion of the task and must ensure that the workcards clearly identify the scope of the independent inspection;"</p>	
110	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC3 145.A.48 (b)	20 - 22	<p>Page No: 21 of 30</p> <p>Paragraph No: AMC3 145.A.48(b) paragraph c)1)i.C</p> <p>Comment: The text does not cover base maintenance where</p>	

	Performance of maintenance		<p>the release is made by a CAT C certifier.</p> <p>Justification: During base maintenance of large aircraft the task will not be subject to an individual maintenance release to service.</p> <p>Proposed Text: "the maintenance release or sign off for the completion of the task is performed by the 'authorised person' after the independent inspection is carried out satisfactorily; and"</p>
111	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC3 145.A.48 (b) Performance of maintenance	20 - 22	<p>Page No: 21 of 30</p> <p>Paragraph No: AMC3 145.A.48(b) paragraph c)1)i.D</p> <p>Comment: The text does not reflect the common text as specified in AMC2 M.A.402(g)(a)4.</p> <p>Justification: The workcard should reference date, name and authorisation number.</p> <p>Proposed Text: "the workcard system established by the organisation should record the name, signatures and authorisation number of both persons, the date of and the details of the inspection, as necessary, before the maintenance release, or sign off for the completion of the task is issued."</p>
113	B. Draft Rules - III Draft Decision AMC to Part-145 - AMC 145.A.48 (c) Performance of maintenance	22	<p>Page No: 22 of 30</p> <p>Paragraph No: AMC 145.A.48(c) paragraph c)</p> <p>Comment: There is too much emphasis on CDCCL requirements. Whilst important there are many Complex and Large aircraft where CDCCL is not applicable. Furthermore a CDCCL is part of an Airworthiness Limitation (AWL).</p> <p>Justification: Equally important is to ensure that any mandatory requirement including all Airworthiness Limitations and Airworthiness Directives are not compromised when performing maintenance.</p> <p>Proposed Text: "ensuring that when carrying out a modification, repair or maintenance, Airworthiness Directives and Airworthiness Limitations, including where applicable CDCCL requirements are not compromised."</p>
114	B. Draft Rules - IIV Draft Decision GM to Part-145 - GM1 145.A.30 (e) Personnel requirements	29	<p>Page No: 29 of 30</p> <p>Paragraph No: GM 145.A.48(b)</p> <p>Comment: The sources to identify flight safety sensitive maintenance tasks are agreed but suggest amending item 1) and add an additional item.</p> <p>Justification: To provide extra clarity.</p> <p>Proposed Text: Revise item 1): "information from the TC/STC holder;" Add new item 9): "tasks specified by the aircraft operator/CAMO."</p>