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<b>Title</b>	Review of Part-147 — Proposed amendments
<b>NPA Number</b>	NPA 2023-10 (B)

**EAMTC** (secretary@eamtc.org) has placed **70** unique comments on this NPA:

<b>Cmt#</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
509	(General Comments)	0	<p><b>GENERAL COMMENT OF EAMTC MEMBERS:</b></p> <p>The amendment to Part 147 is expected for many years, so we welcome positively some area of the NPA (we try to highlight these into the comments too) as well as we found some weaknesses and contradictions, as well as, possible areas that could lead to a safety issue.</p> <p>The goal to fight frauds is fully agreed and supported, but the overall feeling of the NPA is that the opportunity has been missed to improve regulation with the aim of achieving higher training standards, in order to train competent maintenance personnel capable of carrying out safe maintenance.</p> <p>The NPA appears focused on strongly increasing complexity but to get the "same" standard and quality of training. Maybe this approach could reduce the frauds too, this is good, but in the other way round, in the current scenario of significant shortage of licensed or well-trained engineers, such complexity may further aggravate the gap, and therefore it could have a significant impact on the aircraft maintenance quality and lead to a safety issue.</p> <p>More generally in an amendment the industry needs at least:</p> <p>Consistency and effectiveness with the principles defined in the TOR.</p> <p>Changes in the regulatory should be kept simple, precise and understandable.</p> <p>Clear standards, but not gray areas that leave room for interpretation and do not allow to ensure a level playing field.</p> <p>Award mechanisms based on AMTO performances (such as extension of the oversight cycle), without a well-defined standard, does not allow to ensure a level playing field too. The NPA should always take into account the points/topics discussed and emerged over the years of exercise of this regulation (e.i. the definition of "actual maintenance working environment" has generated in the past many interpretations and significant differentials in the system, and it is still present in the NPA without any definition - a comment is provided for the 147.A.200).</p> <p>---</p> <p>General</p> <p>It has to be outlined, that although numerous comments were made, that they only form a general overview, as otherwise the inputs would have become too extensive.</p>	

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		<p>Generally applicable</p> <p>1.The proposed changes in this NPA are seen as too extensive  NPA 163 pages; actual Part-147 approx 50 pages (easy access rules)</p> <p>2.In general, it has come to our attention, that a direct comparison (one side the current text and directly opposite the proposed text), would improve the comprehension of the proposed text. We therefore would like to ask weather this in future could be a possible way for the EASA, especially when a huge amount of changes is proposed</p> <p>3.From our understanding, the clarity, shortness, accuracy and conciseness of the proposed text could have been improved before its publication</p> <p>4.In general, it is requested that, in order to ensure equal understanding and handling, the text shall be simplified and shortened</p> <p>5.A comparison with the actual published Annex IV showed small changes to the text, which was published as the current text, which was not well received and raised a certain uncertainty of the text correctness</p> <p>6.Quality Management  It is requested if the EASA would be so generous to adapt this Appendix in order to have a clear differentiation between Compliance Monitoring (independent) and Compliance Management (AMTO)</p> <p>Example of a simplified text  Text proposed by EASA  For the purpose of this Annex, the competent authority shall be:</p> <p>(a) for organisations that have their principal place of business in a territory for which a Member State is responsible under the Convention on International Civil Aviation, signed in Chicago on 7 December 1944 ('the Chicago Convention'), the authority designated by that Member State, or by another Member State in accordance with Article 64 of Regulation (EU) 2018/1139, or the Agency if the responsibility has been reallocated to the Agency in accordance with Articles 64 or 65 of Regulation (EU) 2018/1139; or</p> <p>b) for organisations that have their principal place of business outside a territory for which a Member State is responsible under the Chicago Convention, the Agency.</p> <p>Example of a simplified text  For the purpose of this Annex, the competent authority shall be:</p> <p>(a) for organizations based inside the territory of the Chicago Convention, the authority designated by that, or another Member State, or the Agency if the responsibility has been reallocated to the Agency (Articles 64 or 65 of Regulation (EU) 2018/1139); or</p> <p>(b) For organizations based outside the territory of the Chicago Convention, the Agency.</p>	

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508	147.A.15 Application for an organisation certificate	9	<p>147.A.15 Application for an organisation certificate</p> <p>It is requested that the term "...amendment to an existing certificate in accordance with this Annex..." is omitted, as no changes can be requested based on a different Annex to an approval based on this Annex.</p> <p>The definition in the point b) 6 and 7 seems equivalent, remove the sentence in the point 7.</p>	
510	147.A.25 Subcontracting	10	<p>147.A.25 Subcontracting</p> <p>The definition in the point b) should be in the point a) and viceversa.</p> <p>The word HAZARD seems to introduce SMS: During EASA 147 review group meetings it has been concluded not to introduce SMS to 147 as the working environment is significantly different to OPS/145/CAMO, but only to allow "bigger" organisations to use their existing SMS required by other approvals. As the administrative burden will increase significantly with nihil benefit to training process and students.</p> <p>(147.A.110 Management system is proof of the introduction)</p> <p>Clarification required: Will own organisations which were up to today treated as freelancer considered as subcontracting organisations?</p>	
575	AMC2 147.A.15 Application for an organisation certificate	10	<p>AMC 2 147.A.15 Application for an organisation certificate</p> <p>As general comment, the AMC2 seems to be more explanatory, part of it may be part of the GM. It is requested, that this text is omitted, or reworked into a GM, as understood as merely an explanatory text.</p> <p>It is requested, if AMC1 and AMC2 could not be merged, for the ease of reading, understanding and handling.</p> <p>It is requested to omit (b), as seen as successfully covered by AMC1 147.A.15.</p> <p>The definition in the point c) refer to maintenance activities - please replace with maintenance training activities or only training activities as done in other parts of this regulation.</p>	
512	147.A.100 Facility requirements	11	<p>147.A.100 Facility requirements</p> <p>The definition in the point h) should be stated that: A library shall be provided in any format and containing all technical material..... In this way, the use of different formats can allow the MTO ensure the presence of the library in all approved locations, in the case of subcontracting, distance learning and so forth.</p> <p>We would like to request a rework of (a), as the enumeration in the text can be read in such way, that it is requested to make provisions for operations of all training activities.</p>	
576	GM1 147.A.25 Subcontracting	11	<p>GM 1 147.A.25 Subcontracting</p> <p>According to the definition of subcontracting in the AMC1 147.A.145 a) 3, the subcontractor can be an organization with or without approvals, as it is, ref point b) it is not clear the requirement to check the validity and relevance of the subcontractor approval. It is required to clarify.</p> <p>It is requested to omit this GM, as understood as successfully covered by 147.A.25</p>	

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			<p>During EASA 147 review group is has been concuded not to introduce SMS to 147 as the working enviromment is significant different to OPS/145/CAMO, only to allow bigger organisation to use their SMS required by other approvals.</p>	
513	AMC1 147.A.100( i h ) Facility requirements	12	<p>AMC 1 147.A.100(h) Facility requirements</p> <p>The "training material" should be placed under a separate title to ease up the reading and working with this Annex, as seen different from the facilities.</p> <p>As it was observed in the past, that the term "Avionics documentation should cover a representative range of available equipment" was differently handled by different NAAs/companies, we would like to request the creation of a term, which can be used free of any interpretations.</p>	
514	147.A.105 Personnel requirements	13	<p>147.A.105 Personnel requirements</p> <p>When reading the proposed text, it came to our attention that the ACM is finally understood as a leading function, responsible for the AMTO and in charge of its operation. We would like to request that the ACM stays with the function outlined by the nomenclature of the title, a position with financial oversight (omission of items 1, 2, and 3 of (a)), as otherwise no longer a need for a training manager can be seen.</p> <p>We would like to request an implementation of a definition of the term "lengthy absences" (d), in order to prevent different handlings.</p> <p>It is requested that the text in (d) is altered, as organisational and compliance matters shall be dealt with by the training manager, the exam manager and the compliance manager. The ACM shall stay limited to the required financial power, in order to ensure the availability of financial experts for finances and at the same time to ensure that the business is not only by financial professionals, but by leading experts</p> <p>In the point (e) it is requested to clarify how to demonstrate the working knowledge of this Regulation for the nominated person. It can be better explain in tha AMC1 147.A.105(e). It is requested to alter (e), in order to allow young talents to grow into such positions, in order to prevent creative work-around solutions, due to a lack of available managerial labours. It is recommended that the persons nominated need to undergo and pass a Form 4 assessment conducted by the respective NAA which is common practice in Switzerland for instance.</p> <p>Remove in (f) " In addition, the organisation shall have a procedure to reassess the work intended to be carried out when the actual personnel availability is reduced." This is a prerogative of the MTO under its existing conditions to define what is required. EASA and the competent authority has only to verify if the MTO is responding and operating properly.</p> <p>It is requested to omit the second sentence of (f), as understood as successfully covered by the first sentence.</p>	

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			<p>When reading (i) the understanding was formed, that the majority of the requirements can be fulfilled with a simple document check. We therefore would like to propose to implement a bi-annual performance evaluation, in order to grant the required education quality.</p> <p>We would like to request an alteration of the proposed text in (k), outlining that instructional technics education is limited to the functions of Instructors and Practical trainers, in order to prevent misunderstandings, where even up to the ACM an understanding of instructional techniques is required. In (k) the difficulty here, is the large room for interpretation. Sufficient experience will be described by the Competent Authority. For consistency purposes "sufficient" shall be described in the AMC.</p> <p>In (l) it is requested to replace compliance manager with training manager as the training manager has full responsibility over the training staff and their education. The compliance manager needs to check the correctness of such authorisations as part of the scheduled audits.</p>	
515	AMC1 147.A.105 Personnel requirements	15	<p>AMC 1 147.A.105 Personnel requirements</p> <p>It is proposed a text simplification and shortening, to avoid local differences, out of interpretations.</p>	
516	AMC1 147.A. 105(a) Personnel requirements	16	<p>'AMC 1 147.A.105(a) Personnel requirements</p> <p>Large organizations probably do not list the CEO as the Accountable Manager, but it is delegated to a Senior Manager responsible for the Training Organization. The requirement for a demonstrated link between the Company CEO and the AM could be quite lengthy in an organization such as a major airplane OEM.</p> <p>While we fully agree that the ACM needs to have direct access to the relevant decision maker, it is of concern that in some organisations the position of the CEO might be as much above the ACM, that a lack of importance awareness could occur.</p> <p>"the accountable manager has direct access to the chief executive " Direct is too strong for large organizations like major OEMs.</p> <p>It is proposed to change the text "has access to the CEO".</p>	
517	AMC 1 147.A. 105(b) ;(c) Personnel requirements	16	<p>AMC 1 147.A.105(b); (c) Personnel requirements</p> <p>We think there is too much separation between compliance and training. Also, is the role of quality manager being replaced? Requires clarification.</p> <p>During the text reading, the impression was formed that in (c), 2 the numbering (i) has been used twice. Correct the numbering sequence.</p> <p>In (c)(1)(i): is not a training manager task. This is a typical Examination manager tasks and not for the training manager. For security reasons and independency, do not mix these responsibilities. Examination managers task and responsibility, seems not logic to list the examination task to a TM.</p> <p>In (c)(1)(i): Essay is only applicable to Basic Training....reading this section this not clear, after all this</p>	

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			section is applicable to all 147 MTO (Basic training & Type training). Requires clarification.	
518	AMC1 147.A.105(e) Personnel requirements	18	<p>AMC1 147.A.105(e) Personnel requirements It will be an even bigger challenge to recruit new nominees with the new requirements. I find tightening the rules adequate but hard in timing according to upcoming lack of certified staff due to retirement. As general comment this part should be reviewed due to inconsistencies and lack of clarity in the text.</p> <p>(a) (1) It seems very restrictive to ask to the compliance manager (quality profile) to have a practical experience and expertise in the aircraft maintenance activities and aircraft maintenance training activities. Proposal: to not apply this requirement to compliance personnel (c) of point 147.A.105 but only to the training and examination manager (b) of point 147.A.105.</p> <p>(a)(2)(i) and (3) are to be deleted as it is with the 147 organisation to decide what qualifies a person for a certain position within the company. The pass of the Form 4 assessment ensures that the person will have the required knowledge for the respective position within the 147 organisation. (a)(2)(ii) Clarification required: What is the idea to introduce EU before management system ? As far as we see there is no specific EU management definition available, please make clear what is meant here.</p> <p>(a)(3)(ii) Clarification required: type evaluation is introduced, no clear definition what the difference is between type evaluation and type training and to which aircraft types/category this applies and what needs to be done (trained) and how to become approved.....please provide more information.</p> <p>It is understood that (a)(4) makes a differentiation of the requirements of nominated persons, depending on the fact if it is (as an example) a secondary education institute. This is not directly found as a fair and equal treatment of organisations and we therefore would like to request the application of relevant accreditations as possible for all organisations as an appropriate alternative. (a)(4) "Relevant academic degree" means a university degree"? To high level for TM and EM, maybe applies only to airlines? not workable for the average 147.</p> <p>(a)(5) to be deleted as there is no need for specific knowledge in instructional techniques for the CM and ACM.</p> <p>(a)(7) Remove Item (7). The other requirements properly covers the description required for the function. The current proposal adds to the burden of bureaucracy and cost to the organisation and may impose unnecessary restrictions to the positions. There is always the competent authority that can judge if the person for the position is properly fit to</p>	

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			<p>execute its duties.</p> <p>(a) (8) The CEFR Level B2 criteria seems more appropriate for such job profiles "Can understand the main ideas of complex text on both concrete and abstract topics, including technical discussions in his/her field of specialisation. Can interact with a degree of fluency and spontaneity that makes regular interaction with native speakers quite possible without strain for either party. Can produce clear, detailed text on a wide range of subjects and explain a viewpoint on a topical issue giving the advantages and disadvantages of various options." Reduce language proficiency requirement from C1 to B2 level. Introduce some alleviations and equivalent means of compliance within AMC/GM for Management Staff and Training Staff. Introduce grandfather rights in AMC/GM. When making decision based on this proposal, please read EASA Foreign Approvals User Guide UG.CAO.00154-003, point 4.3.2</p>	
519	AMC2 147.A.105(i) Personnel requirements	21	<p>AMC1 147.A.105(e) Personnel requirements It will be an even bigger challenge to recruit new nominates persons with the new requirements. I find tightening the rules adequate but hard in timing according to upcoming lack of certified staff due to retirement. As general comment this part should be reviewed due the inconsistencies and lack of clarity in the text.</p> <p>(a) (1) It seems very restrictive to ask to the compliance manager (quality profile) to have a practical experience and expertise in the aircraft maintenance activities and aircraft maintenance training activities. Proposal: to not apply this requirement to compliance personnel (c) of point 147.A.105 but only to the training and examination manager (b) of point 147.A.105.</p> <p>(a)(2)(i) and (3) are to be deleted as it is with the 147 organisation to decide what qualifies a person for a certain position within the company. The pass of the Form 4 assessment ensures that the person will have the required knowledge for the respective position within the 147 organisation. (a)(2)(ii) Clarification required: What is the idea to introduce EU before management system ? As far as we see there is no specific EU management definition available, please make clear what is ment here.</p> <p>(a)(3)(ii) Clarification required: type evaluation is introduced, no clear definition what the difference is between type evaluation and type training and to which aircraft types/category this applies and what needs to be done (trained) and how to become approved.....please provide more information.</p> <p>It is understood that (a)(4) makes a differentiation of the requirements of nominated persons, depending on the fact if it is (as an example) a secondary education institute. This</p>	

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520	AMC3 147.A.105(i) Personnel requirements	21	<p>AMC3 147.A.105(i) Personnel requirements</p> <p>While reviewing "competency assessment objectives" and "competency assessment procedures", it came to our attention, that both are numbered as the same AMC (AMC3 147.A.105(i)). We therefore would like to ask for a merge of these two AMCs, for the ease of handling.</p> <p>In general were both texts (competency assessment objective and competency assessment procedure) found as much too excessive for a training organisation. The text is seen as adequate for maintenance personnel, but not for training personnel, especially as when working in the maintenance environment the Part-145 organisation will carry out this competency assessments, if the related function wants to work unsupervised at the aircraft. We therefore would like to ask for a reduction of the proposed text, down to competence assessments for work in the maintenance environment under the responsibility of the related Part-145 organisation.</p> <p>Due to the fact that (d)(1) is requesting, that the</p>	

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			<p>competency needs to be ensured for the duration of the contract of employment, instead of the duties, this is seen as a possible problem for sicknesses, pregnancies, sabbaticals etc. and we therefore would like to request a respective text adaption</p> <p>It is requested that in (d)(3) the TNA is omitted, as carrying out a TNA is not mentioned by the Part-147 as a training function.</p> <p>The continuous competence assessment for management staff should be omitted , as outlined above. In general it is to be said that: Instructors Theory and Practical, Examiners and assessors have to undergo an initial assessment unless they have already been acknowledged for the position in another 147 AMTO. There is no need for continuing assessment as the course feedback will be reviewed regularly by the TM and action will be taken if necessary. Assessment of 147 managerial staff is an alibi exercise where all 147 AMTO have to add additional burden to their organisation in order to overcome something which is not clear at all. Like in Switzerland, the Training manager, Examination manager and Quality manager need to undergo an initial assessment by the FOCA and if passed will be issued an EASA Form4. The regular audit of the corresponding NAAs will disclose weaknesses of 147 AMTO staff and should be addressed there.</p>	
521	AMC5 147.A.105(i) Personnel requirements	24	<p>AMC5 147.A.105(i) Personnel requirements The nature of this point as presented seems to be a GM but not a n AMC. It is requested to move the content in a GM.</p> <p>Keep as GM: Instructors using new training technologies (e.g. e-tutor, tele-tutor, tele-trainer) should be trained in using these technologies, as well as in the coaching, guiding and assisting of e-learning students. It is important that the instructor understands the electronically based distance-learning process, has the competence to remotely evaluate the learning behaviour of e-learning students and is able to proactively support their learning process."</p> <p>Remove "The following structure provides an example of such an instructor training, as applicable: — Changes and tendencies of today's training; — Fundamentals of methodology and didactics; — Basics and theory of e-learning and tele-tutoring; — Communication in virtual environments; — The changed role of students and instructors; — Competence profile of a tele-tutor; — Practical guide to support learning processes; — Assessment of students' performance; — The learning management system." It is a non required text. It may bias people from the competent authority. Each new technology and has its specific requirements, therefore specific training demands,</p>	

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522	GM1 147.A.105(i) Personnel requirements	24	and the text may guide authorities and representatives to inappropriate solutions and conclusions.  GM1 147.A.105(i) Personnel requirements It is requested that the AMCs and GMs are shortened and merged. While a rework of this Annex is highly appreciated, it is kind of difficult to understand that almost 13 pages for the personnel requirements are required, when the former Annex existed of approx. 50 pages In cases EASA insists in this GM, a new review needs to be carried out.  Remove GM1 147.A.105(i) Personnel requirements, COMPETENCY ASSESSMENT ELEMENTS from SECTION A – TECHNICAL REQUIREMENTS, SUBPART B – ORGANISATIONAL REQUIREMENTS. It may serve as reference into SECTION B – PROCEDURES FOR COMPETENT AUTHORITIES.	
523	147.A.110 Management system Records of instructors, examiners and assessors	27	147.A.110 Management system 147.A.110 Management system <del>Records of instructors, examiners and assessors</del> in the NPA 2023-10 the section records of instructors, examiners and assessors should be crossed out as this section mentions only the management system. in this section there are no procedures for records of instructors, examiners and assessors."Records of instructors, examiners and assessors" will be deleted from the title.  (a) Its seems more a listing with requirements for the management system... Its seems looking at GM1 that records instruc etc need to be deleted. this is about the Managements system (which was discussed in the 147 review group and decided not to make it mandatory but optional for MTO's which are part of a bigger organisation and it's existing SMS system.  Text shortening and simplification, would be highly appreciated.	
524	GM 1 to 147.A.110 Management system Records of instructors, examiners and assessors	29	GM1 147.A.110 Management system It is unclear, if this GM, simply wants to advise, that the Management System is one of the elements, which need to be part of the compliance monitoring. We would be pleased by either a textual simplification (if understood the intention correctly), or by a more clear guideline	
577	AMC2 147.A.110(a)(5) Management system	30	AMC2 147.A.110(a)(5) Management system  Type theoretical training often occurs at the customer's location for a limited duration. In our current MTOE we have a Remote Site approval procedure with the stipulation that selected remote sites will be audited for compliance. Would this meet the intent of the new regulations?  (c),(h) Unannounced onsite audits can cause a financial burden for those ATOs with multiple locations around the world. We agree with a certain percentage of unannounced	

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			audits if they can be conducted remotely. Audits of locations not in the MTOE should also be conducted remotely through an approved offsite location provision.	
525	AMC4 147.A.110(a)(5) Management system	32	AMC4 147.A.110(a)(5) Management system It is requested that in (e) the current regulation with one accountable manger meeting per year is sufficient since the training manager who has the daily business operational responsibility holds regular meetings with the accountable manager.	
526	147.A.115 Instructional equipment	36	147.A.115 Instructional equipment We recognised some reading difficulties, as it seems, as something is missing in the text. Proposed improvement in the text.  (d) wrong reference to the 147.A.100 (e), it is requested to review the reference.	
527	AMC 1 147.A.115(c) ;(d) Instructional equipment	37	AMC1 147.A.115(c);(d) Instructional equipment (3) There is no reason to specify with which party an agreement should be signed to ensure the access to the "appropriate aircraft". It could be a Part-145 organization, an operator, a lessor and so forth. it is requested to review the text. Propesed to remove (3) as it adds nothing to the subject.	
528	147.A.120 Maintenance t T raining material	37	147.A.120 Training material We were hoping that the proposed changes would also include adaptions to prevent misunderstandings of requirements of different Annexes, which counts also for the term task training, which is used in Part-145 and Part-147 with a different meaning.	
529	AMC 1 147.A.120(a) Maintenance t raining material	37	AMC1 147.A.120(a) Training material Although the importance of current training material is generally supported, we have to outline, that training material is different from the official documentations and therefore only need to be current in a limited way. We therefore would like to ask for reconsideration of this alteration (most training documents only need to be checked annually, or before use, when not used for some time).	
531	147.A.125 Record s - keeping	38	147.A.125 Record-keeping General comment - The consistency with the data protection law should be verified. It is understood that, by data protection laws, each student can request a data deletion and that data, which not any longer needs to be processed needs to be deleted. Is it understood correctly that this IR forms a legal requirement prevailing all members data protection laws?  (a)(1)(ii) It's definitely unclear, why in the "Record Keeping" should be a requirement such that? Normally there is a commercial agreement between the organization and its customer, in the event of commercial issue the organization must have the rights to retain the certificate(s) of recognition. It is requested to remove the point.	

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			<p>(a)(1)(iii) The organisation shall retain the records under point (a)(1)(i) for a minimum period of 5 Years. Records type to be specified, we propose only electronic and/or digital copies could be retained for 10 years.</p> <p>(a)(2)(ii) This change is positive. Require Clarification: What will be the status of the records submitted to a retention of an "unlimited period"? The 10 years retention period will apply to all?</p> <p>(b) It is requested that the terms "adequate storage" and "reliable traceability of all activities" is described, in order to prevent different interpretations/handlings.</p> <p>(e) The term "granted access to personnel records" is for us strongly depending on the legal hierarchy (what prevails: European data protection law or the Annex IV?). It has, additionally to be outlined, that we are facing difficulties of IT protection issues, as the IT access of an authority can only be surveyed limitedly, especially as this is an access outside of the legal entity.</p>	
532	AMC2 147.A.125 Record-keeping	40	<p>AMC2 147.A.125 Record-keeping</p> <p>(a) The amount of requested information needed under the record-keeping is found as way too excessive. Text shortening and simplification would be highly appreciated.</p> <p>(c) As outlined under the IR is the external access for the authority seen as difficult to handle, which becomes more complicated, when (c) requests ensuring protection from access of unauthorised persons, as the NAA is outside of control of the AMTO</p>	
535	147.A.130 Training procedures and quality system	41	<p>147.A.130 Training procedures</p> <p>(b) It is totally unclear. A business agreement between the organization and the customers (individuals or companies) should be market related matter with the related local law requirements and references. Obviously whatever is written in the agreement between the parties, everything concerning the training activity shall be carried out by the organization i.a.w this annex and the approved procedures in the MTOE. The way to establish an agreement and its terms should remain a right of the organization. This point is found overdone, it is requested to remove it.</p>	
533	GM1 147.A. 130 Training procedures	46	<p>GM1 147.A.130 Training procedures</p> <p>It is requested that this GM is omitted, out of the aforementioned neutrality of proper procedures, which therefore do not require this GM.</p>	
534	AMC1 147.A.130 Training procedures	46	<p>AMC1 147.A.130 Training procedures</p> <p>(a)When working through the (a), the question was formed if understood correctly, that the outlined report should be sent to the compliance manager? The text in (a) is requesting that the personnel receive training and instructions on reporting differences. This is not understood as correct. When trained, what is the need of instructions, or the other way around when instructed, what is the need for an additional training? It has, additionally, to be outlined</p>	

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			<p>that this is believed as a topic, which should be, out of its importance, outlined in the MTOE. This would directly solve the request of training and / or instruction, as employees need to know the applicable MTOE passages.</p> <p>It is requested that (a) is amended, in order to allow enough time, to implement best practices correctly, as the text currently simply requests up-to-date information, which means that between exploring a problem and procedures up-date the organisation is in a non-compliance situation.</p> <p>(c) It is requested that (c) is omitted, as processes have to be neutral (which includes just culture items) and measurable. Therefore, it is believed that there is no need to ask for compliance with human factors principles, as seen successfully covered by proper processes.</p>	
536	AMC1 147.A.130(b)(1) Training procedures	47	<p>AMC1 147.A.130(b)(1) Training procedures</p> <p># The way to establish an agreement and its terms should remain a right of the organization. It is a market related matter and not directly connected with the training procedures and the conformity of the organization. This AMC is found overdone in the context of training (armonization of the annexes and IR is welcome, but can't be only copy and paste), it is requested to remove it, or it should be simplified and moved in the GM.</p> <p>It is seen and understood as the duty of an AMTO to ensure that their training contracts comply with the applicable regulations, especially as national market rules need to be observed. It is generally not positively received that the EASA starts to dictate business terms to the AMTOs. It is requested that this AMC be removed.</p>	
537	147.A.132 Performance of training activities	48	<p>147.A.132 Performance of training activities</p> <p>It is requested that this IR is reworked, as we believe that too many items are outlined, which are included in normal business practices. Example: if (a) only activities are allowed to be carried out, which are included in the approval, personnel needs to be available etc. It came to our attention that possible fraud of the system is a latent fear for the EASA, which started to dictate numerous sentences in this proposal. While this is generally understood and partially accepted, we would like to remind all involved parties that trying to prevent fraudulent actions is impossible, it can only made difficult. While outlining this, we also have to outline that dictating a fraud preventing to the AMTOs is seen as, impossible.</p> <p>It has to be, with all possible respect, outlined, that (c) and (d are) far too excessive and needs a rework</p> <p>(c) (7) requires a activity report on a yearly basis this seems to exist beside the examination planning which is also shared. the 147 MTO is now suddenly to produces a lot of data to the NAA, this creates a lot of administrative burden for training organisations.</p> <p>In the 147 B section there are no requirements for NAA's what to do with this information... To produce a lot of data to our NAA (plannings are amended frequently by customers/operators) will overload them and us with no clear improved fraud mitigation output.</p>	

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			<p>Yearly activity report !! beside the examination planning and required updates huge administrative burden with no clear results (NAA's are overloaded with work and able to handle the huge amount of data and no means to act on it)</p> <p>(d)(2) (iii): the 10% renewal for MCQ questions is significant for BT modules but even harder to realise from the Type training courses.</p> <p>In certain topics there is not enough to learn and ask.....when this is introduced it will create most likely new MCQ's just to meet the 10% renewal instead with reduced quality. Most topics/aircrafts systems are not changing over the years in one type of aircraft...</p> <p>example: B1= 690 total examination packages is 690 MCQ= so every year 69 MCQ to be renewed very high number as the subject has limits to create new questions.</p> <p>Review is acceptable but please do not mandate 10% renewal.</p>	
538	AMC1 147.A.132(c)(2) Performance of training activities	50	<p>AMC1 147.A.132(c)(2) Performance of training activities</p> <p>It is requested that the AMC wording in (a) is reworked, as the classic training method is outlined, as being almost absurd, as seen for pupils, while in the meantime pupils all over Europe are already trained on competences also on classical teaching methods</p> <p>(b): WELDING is removed in Module 7 by EU 2023-989, this makes it a bad example as this is hardly done and the reason to remove it in Module 7.</p>	
539	AMC1 147.A.132(c)(3) Performance of training activities	54	<p>AMC1 147.A.132(c)(3) Performance of training activities</p> <p>(a) Please review language proficiency/competence levels (students) it's all too high and not realistic to mandate these levels in our MTO Part 66 basic and type training environment.</p> <p>As the main sources for the training courses are the Aircraft Technical Publications, the same concepts should be adopted to training material and examination development process as well as for the delivery.</p> <p>Based on that, a level CEFR B2 is excessive.</p> <p>We considered that B2 level too high, we propose to adopt level B1 for Cat B and C, and level A2 for Cat A.</p> <p>(c) A requirement should be always simple, precise and effectively achievable. This point is unclear or not well defined, for instance what skills of the organization personnel should have to accept linguistic certificates? What should be stated in the certificate? The language proficiency level, date of validity (as required by ICAO)? Should the organization check with all the recognized language institutes around the world the authenticity of the certificate? Should the organization retain the copy of the linguistic certificates? and for how long should it be done? Is not in the record keeping.</p> <p>This point is found not consistent, it is required to be revised or removed.</p> <p>(d) it shows the same weakness of the point c), how should</p>	

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			<p>the organization verify the truthfulness of a self declaration of the student that states to be native language speaker? Should the organization retain the copy of the self declaration? and for how long shoul it be done? Is this point potentially in contrast with the European Charter for Regional or Minority Languages?</p> <p>This point is found not consistant, it is required to revised or removed.</p>	
540	AMC1 147.A.132(c)(6) Performance of training activities	55	AMC1 147.A.132(c)(6) Performance of training activities AMC1 147.A.132(c)(7) Performance of training activities The proposal is to merge these two articles, as seen as closely related. We do fear situations where coping with data protection rights can become difficult out of the herein outlined proposal. It is therefore requested that all items, of the activity report not in line with the Data Protection law of any member state is deleted.	
541	AMC1 147.A.132(c)(7) Performance of training activities	55	AMC1 147.A.132(c)(7) Performance of training activities It is to much bureaucracy, an easy and digital reporting is necessary. We do not agree with the full scope of the proposal as it will be an administrative burden on the organization, especially large organizations. We do however agree with part of the proposal.  We do not agree with (2) and (3). 50% of our course offerings are planned a year in advance but some of our older programs are advertised "as requested" because there is not enough demand to publish specific dates.  Remove point (1) and (3) from this AMC, at least for organisations providing aircraft type courses only.  (6) Results of training examinations, assessments and evaluations needs to be specified (pass/fail or marks). It is proposed to report only pass/fail information.  (7) Remove it. We do not agree with 7 and 7(b) because we feel that it will lead to a "quota system" where the organization is more concerned if enough students have failed. 7(b) is especially troublesome because if we are being compared to other organizations what is the best pass/fail rate?	
578	AMC1 147.A.132(c)(4) Performance of training activities	55	AMC1 147.A.132(c)(4) Performance of training activities It was found that this AMC could be simplified, as simply everything is requested to be monitored We would like to express our concerns, related to the prevention of breaches, as we understand that it can be made difficult, but not be prevented.  It is requested that (a) is checked for possible grammatical improvement, as found difficult to read  Clarification required: The question was raised, if the correct understanding of the term continuous is similar to other Annexes, where this means within a time-frame of max. 24	

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			months	
579	AMC1 147.A.132(c)(5) Performance of training activities	55	AMC1 147.A.132(c)(5) Performance of training activities When checking this AMC, it came to our attention that the proposed text for the performance of training actually needs approx. 8 pages, which can be counted as more than 15% of the actual Annex. This raises the question of whether this is meaningful and required. We therefore would like to request a rework of this article, with a focus to the key items.	
542	AMC1 147.A.132(d)(1)(3) Performance of training activities	56	<p>AMC1 147.A.132(d)(1)(3) Performance of training activities (a) a training programme has defined by a syllabus and tuition hours, so that the content (topics) are directly connected with the tuition hours. Why should be defined different percentages between the tuition hours and the completion of the content for the minimum attendance? The minimum attendance should be always defined into the TNA (where TNA is required under Part-66)? it is requested to revised this point.</p> <p>It is requested that no obligation shall exist, where organisations are forced (a) to train students on missed subjects. This is requested out of the reason that more and more students can be observed who are missing parts of the course for attending calls and meetings on an almost daily basis and it shall be prevented that the training needs to be daily enlarged to cover such misbehaves.</p> <p>It is requested that the first paragraph of (a) is deleted or rewritten as training on missed subjects shall only be required, in cases where the absence is above the acceptable limit.</p> <p>It is requested that, for ease of use, only one (1) knowledge/attendance limit is outlined and not different limits for different sorts of trainings.</p> <p>It is requested that (b) is altered, as the content comprehension is normally fully traceable by the Exam/ Assessment results. The Feedback should far more be used to gain general feedbacks.</p> <p>Feedback to (d) outlines, that this is for the majority of the approved Part-147 organisations impossible, due to limited maintenance access, especially for basic training. Propose to remove (d).</p>	
543	147.A.135 Examination s process	57	<p>147.A.135 Examination process General Comment: It is requested that the article is reviewed as found as too excessive and not comprehensive.</p> <p>While it is generally supported that a channel exists, where cheating irregularities etc. can be reported, it is also seen as a complete overstress of the situation – an exam and before the exam several cheating information and addresses where to report to – when handled like this all failed students will report problems to the EASA and we will have the same problem as before some cases, caused by one or two companies out of millions of exams formed a problem and the EASA is since then punishing the whole industry.</p>	

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	<p>(b) requests the examination to be carried out by an approved examiner. It is requested that this is reflected accordingly in the referenced 147.A.105(j), as currently only stating the need for being registered and not outlining, that this is then named as an approved examiner.</p> <p>(c)(3 )It is requested that (c)(3) is shortened and merged, for better comprehensibility.</p> <p>(c)(3)(ii) Referenced point i below ii not found.</p> <p>(d) It is requested to review this point as it is stated. It is found overdone and it damages the organization. It is understandable the submission of the examination plan to the competent authority for the examination that take place in location not listed in the approval and MTOE (probably the time to submit the plan should be extended to 2 weeks to allow the authority to takes their action and logistics details). On the other way round, it doesn't make any sense to submit a plan for the examination which take place in the approved location. This approach is in conflict with the definition of approved or not approved location, and there is nothing similar in the other annexes or IRs, and it constitutes a limitation or damage for the organization whether cannot run its own business, quickly react to market opportunities and make the most of its facilities (its asset/investment). Due the dynamics of aviation training (especially TT) it will hardly be possible to sent new ammended examination plan's to our NAA's before 1 week. Most organisations create a examination plan over a longer period, TT is in most cases on very short notice and hardly able to meet this 1 week requirement. Another factor which applies to all MTO BT and TT: amendments in these training/examination plans on very short notice (less than 1 week/daily basis) , please provide enough regulation flexibility to be able to manage/handle this as this happens..... To short for a organisation running exams on multiple locations. Cancellation normally occurs by force majur and is planned quick after it has been fixed (students have learned and prepared them selves so fair to them the carry out the examination ASAP)</p> <p>(e) As a foreign entity MTO, we coordinate and receive approval for training activities through EASA-Cologne. Will we now have to additionally notify each Member State NAA if approved training occurs in their state, even if EASA has already granted approval for that location? Having to notify and coordinate with the local NAA will be a burden and lead to not being able to deliver an exam when the NAA cannot support. Also, what happens if it's not in EASA member country?</p> <p>It is found overdone and in contrast with the point147.1 a), but more important it is in contrast (infrange) with the main objectives of the Regulation (EU) 2018/1139.</p>	

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			<p>It is requested to remove this point.</p> <p>(f) Request clarification: If we have a remote site approval process and an approved process for exams, why does this change when we are at an approved location other than the ones listed in our MTOE? It is found as bottleneck, as it is true for the industry, the Agency itself, the competent authorities also suffer of manpower shortage. Matching the inspector's availability with customer requests will be very complex, so that, defining a requirement in a regulation knowing that it will not be effective because of manpower shortage, it is useless and makes no sense. However, with the aim to fight frauds, we understand that there must be more attention when an exam takes place in a location not in the approval and MTOE (uncontrolled environment), it is requested to specify if the competent authority supervision can be done remotely, full time or part-time, or by the use of recording video of the examination (this could have an impact on costs to be considered). It is requested to remove this point.</p> <p>(g) Request additional clarification of this requirement. Does this only apply to Basic Training exam or exams that do not require formal type training? Does the inspector have to be onsite to select the examinations? If so, who is responsible for their expenses? For type training of Group 1 aircraft, there are usually multiple exams covering multiple subjects/systems during a course (e.g. B1.1 minimum 150 hours=33 days). For the same reason of competent authority manpower shortage and in the case of any time zone constraint, it is requested to define at least a time frame (24-48 hours) in which the competent authority inspector can select the questions (even several times in the same time frame). It is requested to remove this point.</p>	
544	AMC 1 147.A.135 (a) Examinations process	58	<p>AMC1 147.A.135(a) Examination process General Comment: It is requested that the text is shortened and simplified. From 2 sentences to half a page, it is seen as way too much. It is requested that EASA comes up with a text, where the whole exam topics are streamlined, shortened and covered by a maximum of two (2) pages, which is seen as adequate for this topic from our side. While mentioning this, we would like to express that the current Annex is of approx. 50 pages and now approximately 8 pages are used to cover the exam handling.</p> <p>(a) Seems indicate that the examination manager should be present in every examination. It is requested that (a) is reworked, as the current text can be interpreted in such ways as no exam can be carried out, if the exam manager is not attending it. It is not possible for the Examinations Manager to be everywhere.</p> <p>(b) Remove "no sooner than the day of the examination" as it may not be practical for some organizations traveling and</p>	

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			<p>dealing with paper exams. Some early preparations may be required to be "not in the same day".</p> <p>The statement doesn't take into consideration an examination system for random generation of the examination questionnaires from the questions bank. Ensure that every examination questionnaire has different questions and the related answers with order shuffled makes the system more robust to cheating. It is requested to review the text ensuring the use of a different examination system.</p> <p>The examiner who is often also the instructor has to focus on the course, hence he/she compiles the exam during his course preparation time. As this is done via a digital examination database tool there is no risk that the exams can be stolen as there are no physical printouts, hence it is requested that this should be only valid for paper exams.</p> <p>"No sooner than the day of the examination" is not workable: examination selection and verification takes normally some time. Our organisation produces 322 exams with 18,000 MCQ, with a highly automated system, human checks are still required by our staff to check the integrity of the produced exam. Once created and approved they are kept in a secured safe and sealed, some exams are needed to be sent to our remote examination locations (8) we currently use printed exams and 1 day is simply not a workable option. The key is: security during the examination process which needs to be done by the examination staff. This staff needs to be independent from the training process.</p> <p>(c)(1) Also in this case it is requested to review the text to specify that distance among students and/or segregation should be appropriated to the examination system used.</p> <p>(c)(3) General Comment: Would be good if every authority allows digital audits of classrooms.</p> <p>It is requested to clarify the ambiguity of the sentence "if applicable". Also, it is requested to specify how long the recording should be kept by the organization, as this could have significant associated costs.</p> <p>This "if applicable" is unspecified... no info when applicable! please make it clear which equipment is needed under which circumstances.</p> <p>Require Clarification: Unclear mandatory or not? what do we want here? when is this required under which circumstances (make it clear, no GM found).</p>	
545	AMC2 147.A.135(a) Examination process	59	<p>AMC2 147.A.135(a) Examination process</p> <p>General Comment - This AMC seems to be a guideline, it should be considered as GM. It is requested that this AMC is exported again into a guideline, as placing them into an AMC creates an unnecessary burden for the AMTOs, as diversions always need to be communicated to the NAA.</p> <p>E.g. (e), 13 no penalise for incorrect spelling – but what should be done, if the misspelling could lead into a maintenance error?</p> <p>It is requested that titles are matching the content, which is not seen as the case for (d), as the title is named examination process, while (d) is giving advice to establish</p>	

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			<p>exam questions.</p> <p>(a) It is requested that (a) also foresees, that questions must be in the language corresponding to the official aircraft documentation, maintenance manuals etc.</p> <p>(a) and (b) are found inconsistent with the AMC1 147.A.132(c)(3) Performance of training activities. If students are requested to write concise technical report in technical aviation language (English), it is overdone requesting a CEFR B2 proficiency language level. It is requested that the formerly outlined language proficiency check is deleted, when insisting in the essay question</p> <p>(c) It has to be outlined that clear differences between an essay question and a MCQ is obvious and therefore similar marking is seen as impossible. It is therefore requested that (c) be omitted.</p> <p>(d)(5) is found inconsistent with the AMC1 147.A.105 Personnel requirements. If questions and answers should be formulated as simply as possible, it is overdone requesting a CEFR B1 proficiency language level for the training personnel involved in this task.</p> <p>(d), (e) It is requested that (d) and (e) are merged and simplified, as seen as too extensive.</p> <p>(e)(1) and (3) are found inconsistent (contradictory) as it is stated that "when drafting a question it should be considered the limited practical experience of candidates" but "the question should have a strong bias towards practical maintenance". It is requested to review both points.</p> <p>(e)(3) and (12) are found inconsistent as it is stated that "questions should be written in a technical report style, in a logical sequence" but "the report should not be indexed, itemised or listed. It is requested to review both points.</p> <p>(e)(9) and (13) are found inconsistent/confuse and in contrast with point (d)(5) as it is stated that "the examination is not a test of language" and that "the candidate should not be penalised for incorrect spelling" but then it is requested that "The answer should show the candidate's ability to express themselves in technical language. This includes readability of the language, basic grammar, and use of terminology." It is requested to review the points.</p>	
546	AMC1 147.A.135(c)(3) Examination process	62	<p>AMC1 147.A.135(c)(3) Examination process It is requested that the need for this AMC is reviewed, as already the related IR is seen as excessive</p> <p>It is requested that (c)(5) is reviewed. Although its content is correct, it is foreseeable that students not passing an</p>	

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547	AMC1 147.A.135(b) Examination process	62	exam, will report a possible exam fraud, to overcome waiting periods	
			<p>AMC1 147.A.135(b) Examination process</p> <p>It is requested that this section is reworked, as the proposal shows six (6) AMCs to one (1) IR, which is seen as much too complicated, time consuming and not assisting in the daily work of an AMTO</p> <p>It is requested that the 147.A.135 IR with all its AMCs is reworked in such way that statements are placed only once, but in a comprehensive way.</p> <p>What the proposal actually looks like: 147.A.135 The examination shall be carried out by an approved examiner.. under the oversight and responsibility of the examination manager; AMC1 147.A.135(a) The examination manager should ensure that each examination is carried out to the standard set out in the organisation's procedures; AMC1.A.135(b) The examination manager should ensure that each examination is carried out by an appropriately approved examiner</p>	
548	AMC1 147.A.135(j) Examination process	63	<p>AMC1 147.A.135(j) Examination process</p> <p>General comment - this text is found not clear and based on something which is not in place, such as exchange of information from other organizations or any other sources and so on. Now a day, concerning the fraudulent actions, the competent authority is the only source for the organization and the information are mainly based on whistleblowing without any clear evidences (unfortunately since years, the aviation has experienced how a valid tool like the whistleblowing system has been abused for revenge actions or control of market or national territory). A system (a platform) should be put in place, and included into this AMC.</p> <p>"involvement of organization personnel in fraudulent activities", any reference to employment contract should be removed from the requirement of the regulation, this has national implications that can't be governed into the regulation. Further to that, it is requested to review the text in order to highlight that only in case the involvement in fraud is confirmed, adequate measures will be taken against the personnel involved. The immediate suspension of the personnel seems overdone and unfair without clear evidences.</p> <p>It is requested that the involvement of applicants in fraudulent activities is reworked. As an example: no AMTO will inform another AMTO of any fraud of an examinee, out of data protection reasons. Please note that this directly implements the question of how cases have to be handled, where students ask the AMTO, out of their data protection rights, for data deletion.</p> <p>It is requested that the EASA abstains from direct orders, influencing the working laws of the member states, as this is understood as incorrect and will bring the AMTOs into a situation, where they have to decide which law they will have</p>	

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			to transgress.	
			It is requested that this article is rewritten, as currently outlining "...involved in the violation...", which indicates that, as soon as an involvement was detected the penalisation has to be started, which undermines the human rights to be treated as not guilty until the guilt has been proven.	
549	147.A.140 Maintenance training organisation exposition (MTOE)	64	147.A.140 Maintenance training organisation exposition (MTOE) It is requested that (a)(6) foresees, that these information are outsourced, in order to prevent that every AMTO annually has to request several MTOE changes out of changes in the scope of the instructional staff.  It is requested that (a)(16) is rewritten, in order that the MTOE shall describe the handling of alternatives and that this therefore does not require to establish lists.	
551	AMC 1 147.A.140 Maintenance training organisation exposition	66	AMC1 147.A.140 Maintenance training organisation exposition (MTOE) (b) The sentence should be altered into such a way that person are placed into plural. (persons)	
550	AMC1 147.A.140(a) Maintenance training organisation exposition	67	AMC1 147.A.140(a) Maintenance training organisation exposition Clarification required: We agree as long as we can maintain our past/current indirect approvals processes as granted by EASA. Will it be allowed to maintain the past/current indirect approvals processes as granted by EASA?	
552	AMC1 147.A.140(a)(1) Maintenance training organisation exposition	68	AMC1 147.A.140(a)(1) Maintenance training organisation exposition (MTOE) It is requested that the Statement is from the Training Manager (who in fact has to lead the AMTO) and countersigned by the ACM; the request that a financial position is outlining the required regulation adherence, countersigned by a CEO (5-6 positions or higher above the Training org) is seen negatively.	
553	147.A.145 Privileges of the maintenance training organisation	69	147.A.145 Privileges of the organisation General Comment: It is requested that the text is shortened and simplified (the more complicated a text is written, the more different is the interpretation of it)  (a)(3) Found not clear, it is requested to review the text.  (a)(4) It is highly requested to review this point in order to eliminate any inconsistency.  (a)(4)(i) It is not consistent with the point 147.B.305 d) if the oversight cycle is extended how will the maximum number of sessions change? it is required to review this point.  (a)(4)(i) and (ii) Currently some organizations have an established "Remote Site Approval" process in the MTOE that provides for oversight. OEM customers routinely	

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554	GM1 147.A.145(a)(1)(ii) Privileges of the organisation	72	<p>request type training at their location during the introduction of new aircraft. Many times this involves numerous approved courses (in excess of 3) at a training site that meets the EASA requirements for a limited period. In case of differences type training courses, as some of these courses have only one day of duration and then after only 3 days of training the organisation would need to include this location as approved location. Would the limit of three still apply in this situation? In general limiting the training activities to 3 sessions is not reasonable. We proposed that the limit be removed.</p> <p>(a)(4)(i) and (c) Clarification Required: What is a session in regard to basic examination? One exam or one exam-run with all modules?</p> <p>(b) It is a no sense if the organization has demonstrated to fulfil the related requirement. it is required to remove this point. It is requested that (b) be deleted, as it is seen as under the responsibility of each AMTO how long they want to keep an approval live and bear the related costs (even oversight is not for free): especially the given time frames are forming an annoyance</p>	
554	GM1 147.A.145(a)(1)(ii) Privileges of the organisation	72	<p>GM1 147.A.145(a)(1)(ii) Privileges of the organisation It is recommended that the EASA uses artificial intelligence, in order to ease up and shorten the proposed text (better text, easier comprehensibility, shorter and therefore less misunderstandings</p> <p>It is requested that (c) is removed, as the Part-145 and the related ICA are used to define training requirements related to the certifying staff, depending on the company's approval and scope of work</p> <p>It is recommended that (d) is reviewed, as it is understood that newly only a training crediting is allowed, while an examination crediting is not any longer possible.</p> <p>(e) seems to infringe the rights of the student and it is in contrast with the main objectives of the Regulation (EU) 2018/1139. It is requested to review this point and to refer the EASA FAQ n.19079 to better clarify the condition of a basic course in multiple organizations. (should it be in the AMC?)</p>	
555	AMC1 147.A.145(a)(3) Privileges of the organisation	72	<p>AMC1 147.A.145(a)(3) Privileges of the organisation It is requested that the text is shortened and simplified – it encompasses actually more than 2 pages, but can be shortened to approx. 0.5 to 1 page, when writing in plane and accurate language – it is believed that a regulation shall give a clear guidance of what is not allowed and allow then the AMTOs to organize themselves inside the given rules iso trying to write down each possible detail.</p> <p>(b)(1) seems inconsistent. There is no reason for not to subcontract training without its corresponding examination or assessment. It is always a way to verify the effectiveness</p>	

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			<p>of the subcontracted task by carrying out the related exams and the assessments. It is requested to include M17 to the list of possible sub-contracting, as many AMTOs have difficulties to access Propeller aircrafts, when specifically educating B1.1 on jet engines. Sub-contracting should generally also be possible to organisations, which show special topic knowledge required for the related training subject.</p>	
557	147.A.150 Changes to the maintenance training organisation	77	<p>147.A.150 Changes to the organisation It is requested that the text consistency is checked Example (a) The following changes to the organisation shall require prior approval by the competent authority: The procedure as regards changes not requiring prior approval referred to in point (c); (c) All changes not requiring prior approval shall be managed and notified to the competent authority as set out in the procedure referred to in point 147.A.140(a)(10).</p>	
558	GM1 145.A.150 Changes to the organisation	78	<p>GM1 147.A.150 Changes to the organisation It is requested that the 147.A.150 is written in such a plain language, that this GM is not any longer required</p>	
559	GM1 145.A.150(a)(1) Changes to the organisation	78	<p>GM1 147.A.150(a)(1) Changes to the organisation GM1 145.A.85(a)(2) Changes to the organisation GM1 145.A.85(b) Changes to the organisation It is requested that the EASA checks titles/numbers, as no 145.A.85 was found in this Annex. It is recommended that the EASA, although when copying articles, checks the consequent numbering. It is requested that these three (3) GMs are merged.</p>	
560	GM1 145.A.85(a)(2) Changes to the organisation	79	<p>GM1 147.A.150(a)(1) Changes to the organisation GM1 145.A.85(a)(2) Changes to the organisation GM1 145.A.85(b) Changes to the organisation It is requested that the EASA checks titles/numbers, as no 145.A.85 was found in this Annex. It is recommended that the EASA, although when copying articles, checks the consequent numbering. It is requested that these three (3) GMs are merged.</p>	
561	GM1 145.A.85(b) Changes to the organisation	79	<p>GM1 147.A.150(a)(1) Changes to the organisation GM1 145.A.85(a)(2) Changes to the organisation GM1 145.A.85(b) Changes to the organisation It is requested that the EASA checks titles/numbers, as no 145.A.85 was found in this Annex. It is recommended that the EASA, although when copying articles, checks the consequent numbering. It is requested that these three (3) GMs are merged.</p>	
562	147.A.155 Continued validity	79	<p>147.A.155 Continued validity Require Clarification: It is not understood that on the one side a list of AltMoCs is requested and its changes need an approval prior the changes occur, but, on the other hand, with no effect on the continued validity in cases of non-compliance with the aforementioned requirements.</p>	
563	147.A.160 Findings and observations	80	<p>147.A.160 Findings and observations It is requested that the IR, the AMCs and the GM are shortened and outlined in a more comprehensive way.</p>	

Cmt#	Segment description	Page	Comment	Attachments
			<p>It is recommended that the EASA abstains from copying articles of other Annexes and keeps this Annex tailor-made to AMTOs, without the need for writing down every possible aspect of a detail.</p> <p>It should be differentiated between findings and recommendations (there is no difference between finding and observation hence there is no need for another term).</p>	
564	AMC2 147.A.160 Findings and observations	81	<p>AMC2 147.A.160 Findings and observations</p> <p>General comment - It should be specified that organization may also decide not to take any action upon observations, otherwise it is forviant with respect to a finding.</p>	
565	GM1 147.A.180 Means of compliance	82	<p>GM1 147.A.180 Means of compliance</p> <p>GM2 147.A.180 Means of compliance</p> <p>It is requested to make a proper reference iso this GMs.</p>	
566	GM2 147.A.180 Means of compliance	83	<p>GM1 147.A.180 Means of compliance</p> <p>GM2 147.A.180 Means of compliance</p> <p>It is requested to make a proper reference iso this GMs.</p>	
567	AMC1 147.A.180(b) Means of compliance	83	<p>AMC1 147.A.180(b) Means of compliance</p> <p>It is requested to foresee, that AltMoCs, properly covered by the MTOE do not need (a)(3). Remove (a)(3).</p>	
580	147.A.200 The approved b B basic training course	84	<p>147.A.200 The approved Basic training (e) the definition of "actual maintenance working environment" has generated wide different interpretations and standards sice years. It is required to clarify the meaning of "actual maintenance working environment".</p> <p>Clarification Required: Please define actual maintenance working environment – Approved 145 organisation or also a "created actual working environment within the 147 organisationusing 145 standards?</p>	
568	AMC 1 147.A.200( d e ) The approved b B basic training course	85	<p>AMC1 147.A.200(e) The approved Basic training:</p> <p>As EASA knows this wording "an actual maintenance working environment" causes for many years standarisatoin issues all over europe, as there is no clear definitions what this is....</p> <p>The idea was (EASA explantions during EAMTC meetings) it is not needed to use or be a Part-145/CAO, training must be done on if "simulated" in a building with representative aircraft and components where students learn to work according AMM instructions and 145/CAO working principles according Part-M/ML standards.</p>	
569	AMC 1 147.A.210( b c ) Basic practical assessment	87	<p>AMC1 147.A.210(c) Basic practical assessment</p> <p>It is requested that the EASA considers cases, where the assessor has to stop and / or interfere with the ongoing work, in order to prevent a dangerous situation, which shall immediately result in a non-pass of the practical assessment</p>	
570	147.A.300 Aircraft type / task training	88	<p>147.A.300 Aircraft type training. Please correct the structure of the regulation for Aircraft Type Training, Examination and Assessment. Please alleviate the rigid examination process requirement for aircraft type examinations as part of aircraft type training.</p>	
571	AMC1 147.B.120(b);(c) Means of	102	<p>AMC1 147.B.120(b);(c) Means of compliance</p> <p>It is requested that in (c) the MOE is altered into MTOE</p>	

<b>Cmt#</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
572	GM1 147.B.120(b);(c) Means of Compliance	102	GM1 147.B.120(b);(c) Means of compliance It is requested that it is foreseen, that only in important cases national guidelines are developed, as it is feared that within no time a tremendous amount of additional AMCs will be developed and published and therefore will lead into a situation where as much as possible is outlined in this Annex iso what needs to be outlined.	
573	147.B.300 Oversight principles	117	147.B.300 Oversight principles Clarification required: As a foreign entity 147, does this mean we may have 2 auditors (EASA and NAA) when training occurs in a member state location? If so, who is responsible for the additional costs involved?	
574	Appendix I to Annex IV - 147.A.200 Basic training course duration	130	Appendix I to Annex IV – 147.A.200 Basic Training It is unclear whether the license entries will now be labelled as BT..., in such cases, it is requested to delete the BT, as one is a license type and the other one is the training for the license category.	