

### Comment response document for NPA 145-11

A total of 20 comments were received from 4 JAA-NAAs, 1 JAA Central Division, 2 Euro Associations, 8 JAR145 organisations, 1 USA Manufacturer and 1 European Operator.

Com-ment N°	Commentor	NPA Paragraph	Proposed text	Reasons	Response
000001	JAA-NAA		No comment.		None required
000002	JAR 145 Org.		Agree. (The proposal is excellent; it leaves no loose ends and will greatly help the maintenance organizations in accepting items for use. I am glad to see the word 'conformity' is disappearing from the Form One. This will tighten things up considerably.)		None required
000003	JAA-NAA		Agree.		None required
000004	JAR 145 Org.		No comment.		None required
000005	European. Operator		No comment.		None required
000006	JAR145 Org.		Agree.		None required
000007	JAR145 Org.	App. 3; 3; Block 23	Block 23: The date of signing the Block 19 release to service (d/m/y). The release to service should be signed at the 'completion of maintenance'.	The instructions for the completion of this block as shown date (d/m/y). Is it better if the month is indicated with a digital number because in French language, June and July are 'juin' in accordance with 'Juin' and 'Juillet'.	It is intentional that the month be shown in "letters" to prevent confusion with the different ways that "numbers" are used throughout the world. The general instructions currently state that the certificate should be completed in English (for export purposes). If it is completed in the National language, for local use then enough letters should be used to differentiate between months where the use of only three letters would be ambiguous.

000008	JAR 145 org	App. 3; 3; Block 12	Block 12: Change the word sequence 'part/component/assembly/item' in the subparagraphs 1-4 to the single word 'item'.	Definition of 'item' is already given in the first paragraph of chapter 1 of appendix 3.	Agreed. Text amended accordingly.
000009	JAA-NAA	App. 3; 1	The use of the terms 'item' and 'component' is confusing with respect to the amended definition of 'aircraft component' in 145.5.		The text of the first sentence of App.3;1 uses the same words as the JAR 145.5 definition in a slightly different order, however the order of the words has now been changed in App. 3;1 to match the 145.5 definition.
000010	JAA-NAA	JAR 145.5	Question: Is this definition of 'aircraft component' only valid for JAR-145 or is it consistent throughout all JARs dealing with aircraft component matters?		It is mainly for JAR 145 however it must be remembered that the terms commonly used by Production and Maintenance organisations differ because of the nature of the activity.
000011	Euro Association	App. 3; 3; Block 9	Use wording based upon new FAA Order 8130.21C with modifications for JAA. See APPENDIX.	The current statements for this block between JAR 21, JAR 145 and the FAA Order 8130.21C are not consistent and could lead to confusion. The attached APPENDIX gives the comparison. We propose to use the FAA text as the basis with adaptation for JAA needs to assure maximum harmonization.	Not accepted. It was realised quite early in the process that the instructions for the three participating bodies could not be the same. It was also accepted that for the European industry, the instructions for JAR 21 and JAR 145 use of the Form One would differ because they are aimed at different parts of the industry and if combined would tend to cause more confusion.

000012	JAR145 Organisation		Will temporary guidance leaflet N° 21 still be applicable where an organization holds JAR-145 and FAR-145 approvals?	No mention of impact of changes on TGL N° 21. It would make sense for the FAA to accept the Boxes 19 through 23 declaration rather than having to add an additional statement to Box 13.	TGL 21 will still be applicable for an FAR 145 approved organisation located in a JAA full member country that has not signed a MIP with the USA. An organisation located in a country that has signed a MIP with the USA must comply with the requirements of the MIP conditions, which also require a statement in block 13.
000013	JAR 145 Organisation		Agree.		None required
000014	USA Manufacturer	App. 3; 3; Block 9	Essentially the situations in both cases are similar. Although the eligibility can be defined for a new item on the day it is released, this can be arranged immediately afterwards, for instance, by the issue of an AD or Mandatory (Alert) Service Bulletin. Consequently, the proposal in NPA 145-11 to make Block 9 optional should also be available in NPA 21-25. To emphasize this point, it is suggested the Block 9 title be changed to: Block 9 Eligibility (optional).  In the same way, the Note 1 to Block 9, proposed in NPA 21-25, should be read across to NPA 145-11. The specification of a readily available document, which could assist the installer in deciding whether such an installation was airworthy, would be of great benefit.	The proposed changes to the Authorized Release Document generally make its use much clearer, but some of the problems with the completion of Block 9 Eligibility remain. The discussion on page 3 of NPA 21-25 is confusing since it links the supply of design data from the Design Organization to the Production Organization to Block 9 when, in fact, this issue is covered by the new form defined in ACJ 21.4. Block 9 refers only to the release of new or maintained items. The rules governing these two situations appear to be different and could be improved by making them identical.	The comment is aimed at the NPA 21-25 proposal and not the NPA 145-11 proposal, with which the commentor appears to agree.
000015	JAA Central Division	App. 3	Delete the word 'item' in the definition of 'Aircraft Component'. Replace the words 'item' and 'items' everywhere in the Appendix, except in Block 6 of the Form and in the completion instructions for Block 6, by 'component' and 'components'.	'Aircraft components' is already defined and used in JAR 145, and has the same meaning as is intended for 'item' in this document. There is no need to introduce another term in the already confusing list of terms: 'products, components, parts, appliances, articles'. Furthermore the	It should be noted that the word "item" was previously included in various places in JAR 21, it is therefore not "another" term. The comment is understood, but is not accepted because of this and the wording of the release

				word 'item' now has two meanings in the Form: Block 6 versus Block 14/15, which is very confusing.	statement on the Common Form.
000016	JAA Central Division	App. 3	The regulatory status of the JAA FORM ONE and its instructions for completion should be reconsidered.	The FORM and its instructions for completion are in ACJ material. However they contain a number of mandatory clauses that actually belong in Section 1. If the authorities find that the content and outline of the FORM is mandatory then the FORM and instructions for completion should be in (an Appendix) to Section 1. If not it can remain in an ACJ. They should then be aware of the consequences that the use of the FORM will not be standardized. (See also an article on this subject for the situation in the USA, attached.) The issue should be harmonized with both FAA and Transport Canada.	Agreed, however this is a policy matter and will need to be discussed further within the overall regulatory system. Such a change would require another NPA. It would also require "a rule change" by the FAA and the time required for this would hold up the introduction of the "harmonised form" for a number of years.
000017	European Association		Agree		None required
000018	JAA-NAA	App. 3; 3; Block 23	The data signing the Block 23 release to service (dd/mm/yyyy). The month should appear in letters e.g. Jan, Feb, Mar etc. (use English abbreviations). The release to service should be signed at the 'completion of maintenance'.	Better understanding and no misunderstanding after translation into other languages.	The intent of the comment is agreed, however the Form can be completed in the National language. The general instructions currently state that the certificate should be completed in English (for export purposes) and this is considered sufficient.
000019	JAR 145 Organisation	App. 3	'1 Purpose and scope': Replace 'The primary purpose of the Certificate is to release parts/ components/ assemblies/ items (hereafter referred to as item(s))' by 'The primary purpose of the Certificate is to release parts/ components/ assemblies (hereafter referred as item(s))'.	To make the text proposed for the JAR 145 consistent with the one proposed for the JAR 21.	Not accepted. As in the earlier version, the list of terms needs to include the "final" term.

000020	JAR 145 Organisation	App. 3; 3; Block 12	<p>The NPA 21-25 defines standard words for the items ‘Manufactured’, ‘Inspected/Tested’ and ‘Modified’; the NPA 145-11 defines the terms ‘Overhauled’, ‘Inspected/Tested’, ‘Modified’, ‘Repaired’ and ‘Reassembled’.</p> <p>The FAA Order 8130.21B defines the terms ‘Repaired’, ‘Inspected’, ‘Rebuilt’, ‘Altered’, ‘New’, ‘Newly overhauled’ and ‘Prototype’.</p> <p>In order that the harmonization task is successfully achieved, a unique list of standard terms should be established for both JAA Form 1 and 8130-3. Are the NPAs 21-25 and 145-11 the source for these words?</p>		<p>It must be recognised that JAA and FAA regulatory systems are still different and these contain the specific wording. It is not necessary for successful harmonisation of JAA Form One/FAA 8130-3 to have identical wording. The comment also omits mention of Transport Canada Civil where terms not shown in the JAR21 or JAR145 proposals are used.</p>
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