

NPA 21-24 Comment Response Document

No.	Commentor	Paragraph	Comment	ORCG decision	Proposed new text
001	CAA - Denmark	General	No comment.	Noted	
0097	Aerospatiale-Matra Airbus	General	Instead of the creation of JAR 21.118(C) as per this NPA 21-24, the NPA 21-25 Common Release Certificate proposes a new section JAR 21-4. The JAAs should identify only one solution to the same issue.	Agreed. The solution of NPA 21-25 to introduce a new paragraph 21.4 is the preferred one. The proposed 21.118C of this NPA 21-24 becomes therefore redundant.	Delete new paragraph 21.118C
248	CAA-UK	21.3(a)	Editorial Explanation. Please clarify what is the word “juncto” is intended to say?	“Juncto” is intended to say “in conjunction with”	No
42.1	Dassault Aviation	21.3(a)	<i>Text to add at the end of JAR 21.3 (a)</i> <u>Note: An occurrence in the sense used in this requirement is an unwanted event which happens in or to an aircraft or aircraft component or the consequences of such an event which are found in or on an aircraft or aircraft component. This is the all encompassing term including accidents, incidents, defects, failures, malfunctions etc.</u> <u>Reason(s) for proposed text/comment</u> The definition of “occurrence” is not given in JAR 1. The text before change was speaking of “occurrences that may involve failure, malfunctions or defects”. The definition of “occurrence” was self contained. The new text speaks of “faults, malfunctions, defects or other occurrences”. No indication is given about what is an “other occurrence”. For this reason the definition given in the explanatory note to the NPA should be added to the text of the requirement.	Not agreed. The inclusion of notes in Section 1 of a JAR is not appropriate (according to draft JAR-11), but moreover the ORCG believes that a definition of occurrence is not necessary. The normal meaning, using the grammatical interpretation, is applicable. The qualification “which cause or might cause adverse effects on the continuing airworthiness” further limits the meaning of the term.	No
0036	JAA DOASCC	21.3(a)	The wording used does not indicate obviously that TC or STC Holders have to take account of events on products other than their own products, in order to take corrective actions as appropriate. This idea can be found in ACJ 21.A239(a), para. 3.1.4s) [“(”) <i>Monitoring of significant events on other aeronautical products as far as relevant to determine their effect on airworthiness of products being designed by the Design Organisation.</i> ”], for DOA Applications/holders. <i>DOASCC suggests to improve the text of JAR 21.3 (a) to enforce it as a requirement.</i>	Not agreed. Although the ORCG agrees this is a sound concept, it does not see a general obligation for the TC/STC holder to do this, mainly because it is difficult to limit such a requirement. The authority should warrant action if they feel it is appropriate, following accidents on other products.	No
0037	JAA DOASCC	21.3(a)	Different requirements are applicable to TC/STC Holders and JPA/JTSA Authorisations holder in JAR	Agreed that this difference is not justified, although on the other hand it is also recognised that for JTSA-A and	Add JTSA Authorisation and JPA Authorisation holders to JAR 21.3(a).

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			21.3(a) and (b) (1): all must report [ref. JAR 21.3(b)(1)], but only TC/STC Holders must have a system to collect, investigate and analyse. This difference is existing in current JAR 21.3 text.	JPA-A holders it will be more difficult to collect reports, because they do not always know who are the operators of their products. (see also comment No. 127)	
0127	DGAC FRANCE	21.3(a)	<p>(Complete rewording) JAR 21.3(a) <i>(a) System for Collection, Investigation and analysis of Data (See ACJ 21.3(a)).</i></p> <p>(1) The holder of a Type Certificate for a product shall have a system for collecting, investigating and analysing reports of and information related to faults, malfunctions, defects or other occurrences which caused or might cause adverse effects on the continued airworthiness of the product (<<FMDs>>) and shall provide information about this system to all known operators of the product.</p> <p>(2) The holder of a supplemental Type Certificate (STC) shall have a system for collecting, investigating and analysing reports of and information related to FMDs caused by the application of the STC and shall provide information about this systems to all known operators having incorporated the STC into a product.</p> <p>(3) The holder of a Joint Parts Authorisation (JPA) or a Joint Technical Standards Order (JTSO) Authorisation shall have a system for collecting, investigating analysing reports of and information related to FMDs caused by the part, appliance or article and shall provide information about this system to all known operators having incorporated the part, appliance or article into a product.</p>	Partially agreed (see also comment No. 37). The ORCG finds that the proposed subparagraphs can be merged.	<p>JAR 21.3(a) <i>System for Collection, Investigation and Analysis of Data. (See ACJ 21.3(a).)</i></p> <p>The holder of a Type Certificate (TC), Supplemental Type Certificate (STC), <u>Joint Technical Standard Order (JTSO) Authorisation or Joint Part Approval (JPA) Authorisation</u> shall have a system for collecting, investigating and analysing reports of and information related to faults, malfunctions, defects or other occurrences which cause or might cause adverse effects on the continuing airworthiness of the product, part or appliance covered by the TC, STC, <u>JTSO or JPA</u>. The holder of a TC, STC, <u>JTSO Authorisation or JPA Authorisation</u> shall provide information about the system developed in accordance with this sub-paragraph (a) of this paragraph to all known operators of the product, <u>part or appliance</u>.</p>
076.1	Airbus Industrie	21.3(a) & (b) (1)	<p>Para. 21.3(a) refers to "...faults, malfunctions, defects or other occurrences which cause or might cause adverse effects on the continuing airworthiness of the product, part or appliance...", whereas para. 21.3(b) refers to "... faults, malfunctions, defects or other occurrences..... ad which has resulted in or may result in an unsafe condition".</p> <p>It is understood that para 21.3(b) (1) only deals with reporting to Authorities , which should concern only a fraction of the data collected in accordance with 21.3(a), and that the words "unsafe condition" have a more restrictive meaning that the words "adverse effects on the continuing airworthiness".</p> <p>Some clarification might be useful on the difference in</p>	Agreed. The new paragraph 10 of ACJ 20.XX explains this principle.	Already in revised ACJ 20.XX

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			meaning between these two wordings (perhaps in the proposed AC 20.XX).		
0043	Dassault Aviation	21.3(a) & (b) (1)	Keep the word failure instead of changing it to fault.	Agreed. Exact identical terminology between JAR-21 and JAR-OPS is not necessary. The title of JAR 21.3 needs some changing to address the full scope of the paragraph.	Change “fault” back to “failure” in all JAR-21 proposals. The title of JAR 21.3 will be “Occurrences, reporting and other required actions”
022	IBA	21.3(b) (1)	<p>As already stated by LBA in the processor developing implementation Procedures for Subpart P, the JPA does not add any additional value to the applicant because he has to fulfil Subpart D as well (JAR 21.95) concerning the minor change - JPA is only applicable for parts and appliances subject to a minor change to the TC (modification part) or a replacement part. In any way he is obliged to achieve a Subpart G approval. This consequently means that a Holder of a Subpart G approval can release parts (JAA is only applicable for parts and appliances subject to a minor change without a JPA as long as he has a proper link to the holder of the approval for the minor change. For replacement parts it is already clear that the Subpart G approval is fully sufficient to release the part. This is fully in line with the policy of JAR-21 to separate responsibilities for Design and Production but to insist on a proper link between both.</p> <p>If it is so, why then should a Holder of JPA be forced into a reporting responsibility but a “simple” holder of a minor change without JPA is not?</p> <p>This should be considered as soon as JPA is mentioned in any of the changes proposed by NPA 21-24.</p>	<p>Not agreed.</p> <p>The question whether the concept of JPA is appropriate is not a subject of this NPA. Currently Subpart P regarding the JPA Authorisation is a part of JAR-21, so all NPA’s have to take this Subpart into account.</p>	No
128	DGAC France	21.3(b)(1)	<p>JAR 21.3(b) <i>Reporting to the Authority</i></p> <p>(1) The holder of a Type Certificate (TC), Supplemental Type Certificate (STC), Joint Part Approval (JPA) Authorisation or Joint Technical Standards Order (JTSO) Authorisation, <u>or production organisation</u> shall report to his National Authority any fault, malfunction, defect or other occurrence of which he is aware related to a product, part, or appliance covered by the Type Certificate, Supplemental Type Certificate or Authorisation collected under JAR 21.3(a), JAR 21.129(e)(2) or JAR 21.165(e)(2), or known by other means, which has resulted in or may result in an unsafe condition. (See ACJ 20.xx)</p>	<p>Partially agreed: “National” to be deleted</p> <p>The reporting requirements of 21.3, 21.129 and 21.165 are made consistent, and there is no further need to move the reporting requirements from Subparts F and G to A.</p>	Delete “ National”
035	JAA DOASCC	21.3(b)(2)	Replace “possible unsafe condition” by “occurrence”.	Not agreed. When it is obvious that an occurrence is reportable the 72 hours start immediately. In other cases	No

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				it may be necessary to gather more information or to perform certain analysis before it can be determined that an unsafe condition may exist. In such cases it would not be realistic to require immediate reporting.	
76.2	Airbus Industrie	21.3(b)(2)	“.....possible unsafe condition” : same remark as above.	Agreed. See also comment No. 76.1 above.	See comment No. 76.1 above
080	Airbus Industrie	21.3(b)(2)	<p>(2) Reports must be made in a forma and manner acceptable to the Authority, as soon as practicable and any case despatched:</p> <p>(i) Not later than 72 hours after the identification of the possible unsafe condition by the holder of the Certificate, Approval or Authorisation, unless exceptional circumstances prevent this. (See ACJ 20-xx.) or</p> <p>(ii) For holders of a Design Organisation Approval under Subpart JA of this JAR-21, in a time compatible with procedures agreed with the Authority.</p>	Not agreed. The current wording of the proposed 21.3(b) (2) already provides for the necessary flexibility.	No.
129	DGAC France	21.3(b)(2)	<p>JAR 21.3 (b)(2) used the word <Approval> which was not used previously. The conflict with 21.3 (b)(1) is avoided by deleting the references to certificate, approval or authorisation.</p> <p>The link with (b)(1) is clear enough by using the opening word <<These>>.</p> <p>As it is true that imposing notification by the TC holder of all reportable events within 72 hours of the actual occurrence is almost impossible in practice (helicopter crash in jungle for example), it is also true that identification of a potentially unsafe situation can take more time. During this analysis, which can take days or weeks, the authority would not be informed: this is not appropriate. That’s why the wording “the information is known” is proposed.</p>	<p>Partially agreed.</p> <p>Not agreed, see response to comment No. 35</p>	<p>(2) <u>These</u> reports must be made in a form and manner acceptable to the Authority, as soon as practicable and in any case despatched not later than 72 hours after the identification of the possible unsafe condition by the holder of the Certificate, Approval or Authorisation, unless exceptional circumstances prevent this. (See ACJ 20.xx.)</p>
76.3	Airbus Industrie	21.3(c)	“...the reported Occurrence...”: it is assumed that his refers only to occurrences reported to Authorities per para.213(b)(1).	Agreed. The text can be improved for clarity.	“When an occurrence <u>reported under subparagraph (b) of this paragraph</u> results
023	LBA	21.3(c)	<p><u>JAR 21.3(c) and (d)</u></p> <p>The paragraph states, that the design responsible (TC-, STC-, JTSO-, JPA-Holder) is responsible for the investigation of manufacturing deficiencies. This does not take into account the a.m. policy of separation of design and production responsibilities within JAR-21. The gap in this statement of JAR 21.3 (c) is obvious. It is understandable for in service aircraft, which have to catch up e.g. by an AD or SB if such a deficiency occurs. The work in this case can only be done under the control of the design responsible.</p>	There is a separation of responsibilities for design and production but the responsibility for continuing airworthiness in case of production deficiencies is not as clear. For production deficiencies the manufacturer is responsible, but in many cases he will need the help of the designer to solve the issue. (See also response to comment No. 130.1 below)	See Comment No. 130.1 below

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			<p>The other side of the medal is to put also attention on possible systematic faults within the Production Approval holder, who is responsible for the manufacturing of the product, part or appliance affected by the manufacturing deficiency. Only the POA-Holder can be made responsible for the investigation and the implementation of necessary corrective actions in the frame of his POA. This last more preventive aspect should also be covered by JAR 21.3 (c). This is even more true if the design responsible and the POA Holder are completely separate entities and/or if the POA Holder is manufacturing products, parts or appliances under his POA which are not certificated under JAA member's responsibility.</p> <p>The same applies to JAR 21.3 (d) (2). If there is a design change as the necessary required action following an occurrence, the information should not only be passed to all known operators. Maintenance and Production Organisations may also have to implement these changes.</p>	<p>True, but the information for the production organisation follows the existing link between design and production and with regard to maintenance, the operator is responsible and should inform the maintenance organisation.</p>	<p>No</p>
130.1	DEGAS France	21.3(c)	<p>JAR 21.3 <i>Investigations of Reported Occurrences</i> . <u>When an occurrence reported under JAR 21.3(b) results from a deficiency in the design or the manufacturing, the holder of the Type Certificate, Supplemental Type Certificate, PA Authorisation or JOTS Authorisation, or the production organisation, as appropriate, shall investigate the reason for the deficiency and report to the Authority the results of his investigation and any action he is taking or proposes to take to correct that deficiency.</u> If the Authority finds that an action is required to correct the deficiency, <u>the holder of the Type Certificate, Supplemental Type Certificate, PA Authorisation or JOTS Authorisation, or the production organisation, as appropriate, shall submit the relevant data to the Authority.</u></p>	<p>See also comment No. 23 above. Agreed, but reference should also be made to reported occurrences under 21.129(e)(2) and 21.165(e)(2)</p>	<p>(c) <i>Investigation of Reported Occurrences.</i> (1) When an occurrence reported <u>in accordance with subparagraph (b) of this paragraph, JAR 21.129 (f)(2) or JAR 21.165(f)(2)</u> results from a deficiency in the design, or a manufacturing deficiency, the holder of the Type Certificate, the Supplemental Type Certificate, the JTSO Authorisation, or the JPA Authorisation, <u>or the manufacturer</u> as appropriate, shall investigate or let investigate the reason for the deficiency and report to the Authority the results of this investigation and any action he is taking or proposes to take to correct that deficiency. (2) If the Authority finds that an action is required to correct the deficiency, the holder of the Type Certificate, the Supplemental Type Certificate, the JTSO Authorisation, or the JPA Authorisation, or the manufacturer as appropriate, shall submit the relevant data to the Authority.</p>
130.2	DGAC France	21.3(d)	<p><i>Airworthiness directives</i> When the Authority considers that issuance of an Airworthiness Directive is necessary to correct the unsafe condition or to require the performance of an inspection, <u>the holder of the Type Certificate, Supplemental Type Certificate, JPA Authorisation, or the production organisation, shall</u> Propose the appropriate <u>changes to the Type Design</u> or the required inspections and submit details of these</p>	<p>Agreed (partially)</p>	<p>(d) <i>Airworthiness Directives.</i> When the Authority considers that issuance of an Airworthiness Directive is necessary to correct the unsafe condition, or to require the performance of an inspection, the holder of <u>the Type Certificate, Supplemental Type Certificate, JTSO Authorisation or JPA Authorisation or the manufacturer, shall</u> (1) Propose the appropriate design changes and/or required inspections and submit details</p>

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			proposals to the Authority for approval. (2) Following the Authority's approval of the proposed <u>changes to the Type Design</u> or inspections, make available appropriate descriptive data and accomplishment instructions to all known operators of the product or <u>having incorporated the STC, part, appliance or article into the product.</u>		of these proposals to the Authority for approval. (2) Following the Authority's approval of the proposed design changes or inspections, make available to all known Operators of the product, part or appliance appropriate descriptive data and accomplishment instructions.
062	Airbus UK	21.3(d)the performance of an inspection, the holder of the Certificate.....	Agreed	Is already incorporated in the above text change.
019	BAE Systems	21.3(d)(1)	Corrective actions appears limited to Design Change or Inspection. Corrective action can also include or be limited to amendment to published data (ie. AFM or AMM amendment).	Agreed, corrective action can also be a simple replacement of a part, without a design change, in case of a production deficiency.	'design change' replaced by 'corrective action'
131	DGAC France	21.118C	JAR 21.118(c) Co-ordination with production and TC holder.	The proposed paragraph is already deleted because of another comment.	No
065	Airbus UK	21.129(e)	No indication has been made with regards to the timescales required to report incident to holder of Type Certificate or Design Approval.	Not agreed. Reference is made to JAR 21.3(b)(2), which contains the timescale.	No
024	LB	21.129(e)(1)	LBA would highly recommend to change the four Subparas so that read ".....and subsequently identified to may have deviations from the applicable design data.....". This Subparas should also cover the real cases where there is a doubt if a product, part or appliance that has been released previously, has a deviation from the design data in order to ensure that the doubt could be cleared by investigation of the relevant products, parts or appliances. This could also cover the current gap for "in production" - occurrences which are normally not reportable, but could have implicit on the already delivered products, parts or appliances.	The idea of the comment is agreed but not the exact text proposal.	".....and subsequently identified to have <u>possible</u> deviations from the applicable design data.....".
77.1	Airbus Industrie	21.129(e)(3)	Sentence might be clarified by saying:"....all cases where he has released products, parts or appliances to that other organisation, and subsequently identified them to have deviations....."	Agreed	(3) all cases where <u>he has released</u> products, parts or appliances <u>to that organisation</u> and subsequently identified <u>them</u> to have possible deviations from the applicable design data.
098	Aerospatiale-Matra Airbus	21.129(e)(3)	Change to JAR 21.129(e)(3): OK for the added requirement, but here is no need to mention ACJ 20.xx there, as it is already decided elsewhere, in sections where what the ACJ provides is more directly related.	Not agreed. The ACJ also contains guidance on reporting between organisations	No
132.3	DGAC France	21.129(e)(3)	Where he acts as supplier to <u>another</u> production organisation, report also to that other organisation all cases where <u>he has released</u> products, parts or appliances <u>to that organisation</u> and subsequently identified to have deviations from the applicable design data.	Agreed, see also comment No. 77.1	"another" in stead of "an other"
025	LBA	21.129(f)	The explanation for the adding of subpara (f) seems to unfold a misunderstanding of JAR-21 Subpart F. The applicant in this case does not have to be necessarily an organisation. Subpart F even can apply to single	Not agreed. Subpart F can be used by small organisations and even by a single person, but also by larger organisations in the starting up phase prior to obtaining a Subpart G POA.	Add a reference to 21.129 and 21.165 in chapter 3 of the ACJ 20.XX.

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			persons. In general Subpart is not resulting in an organisation approval. Subpart F is intended to cover a very small amount of production activity and related to individual products. It simply makes no sense to establish an occurrence reporting scheme to identify trends when there is only a production of one or up to a few places where it is statistically impossible to establish any proven trend.	The wording is generic enough to be used by small organisations. In cases where monitoring of trends is not possible this provision is simply not applicable.	
77.2	Airbus Industrie	21.129(f)	It is suggested to add the word “internal” (to show that it is dealing with an internal scheme) and to use the word “collection” (instead of “collation”) for consistency with 21.3 so as to read: “establish and maintain an <u>internal</u> occurrence reporting scheme to enable the <u>collection</u> and assessment of.....”	Agreed. Collating can be part of the assessment.	establish and maintain an <u>internal</u> occurrence reporting system in the interest of safety, to enable the <u>collection</u> and assessment of occurrence reports
133	DGAC - France	21.129(f)	(f) to establish and maintain, <u>in the interest of safety</u> , an <u>internal</u> occurrence reporting scheme to enable the <u>collection</u> and assessment of occurrence reports in order to identify adverse trends or to address deficiencies. <u>This system shall include</u> evaluation of known and relevant information relating to the occurrences and promulgation of such related information, <u>in particular the assessment and extraction of the occurrences to be reported under JAR 21.3 (b)</u> . See ACJ 20.xx)	Mostly agreed, see also comment No. 77.2	(e) establish and maintain an internal occurrence reporting system <u>in the interest of safety</u> , to enable the collection and assessment of occurrence reports in order to identify adverse trends or to address deficiencies, <u>and to extract reportable occurrences</u> . This system shall include evaluation of relevant information relating to occurrences and the promulgation of related information. (See ACJ 20.xx)
237	CAA-UK	21.129(f)	(f) establish and maintain an occurrence reporting scheme <u>within the organisation</u> , to enable the collation and investigation of occurrence reports in order to identify adverse trends and address deficiencies in the interest of safety including evaluation.....	Agreed, but for text change see response to comment No. 77.2.	No
238	CAA-UK	21.129(f)	Item 7 should be identified as “JAR 21.129(f)” and the newly introduced sub-para. (f) should be quoted in the proposal.	Agreed	Not in rule text.
026	LBA	21.129(f)	b) JAR 21.129 (f) and JAR 21.165 (i) In both Sub-parts F and G there is the requirement to establish a systematic and well defined production system controlled by the Production inspection system (subp. F) or Quality System (Subp G). Both Subparts require that these two Systems show compliance with the applicable requirements including the already defined reporting manual (Subpart F) or the Production Organisation Exposition (Subpart G) including sufficient procedures covering the several requirements. These procedures and its implementation are subject to the investigation and continued surveillance by the Authority and are part of the Authority agreement (Subpart F) or POA (Subpart G). Therefore the currently existing paragraphs of JAR-21 Subpart F and G are fully sufficient to ensure that a reporting scheme to the satisfaction of the authority is established and	Not agreed. Experience shows that it is necessary to emphasise this function even though you could defend that it is part of the necessary procedures of a production organisation. It was, up to now, nowhere explicitly required.	No

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			consequently the proposed additional subparagraphs JAR 21.129 (f) and JAR 21.165 (i) are indeed nothing new and obviously not necessary. If it is regarded necessary to mention the term “occurrence reporting scheme” in the requirements these words should somehow be included in JAR 21.165 (e) which is the right place, and maybe some more information could be given in the ACJ material to this sub-paragraph.		
158	CAA Netherlands	21.129(f) & 21.165(l)	Change “collating” in “collecting”.	Agreed, see comment No. 77.2	See 77.2
044	Dassault Aviation	21.129(f) & 21.165(i)	Establish and maintain a <u>documented</u> occurrence reporting <u>system acceptable to the Authority</u> to enable the collation of occurrence reports <u>including the assessment and extraction of the reportable occurrences and the actions taken</u> . <u>This system shall</u> include evaluation of relevant information relating to <u>the occurrences and to whom this information</u> is distributed (See ACJ 20.xxx).	Gist of the comment agreed. See also Comment No. 133.	No
78.3	Airbus Industrie	21.165	<u>Note concerning 21.165 (e) and 21.165(i)</u> : Internal reporting is a prior condition for a possible external scheme and, in order to respect that logic, the proposed paragraph 21.165(i) should be placed before the proposed paragraphs 21.165(e)(1) and 21.165(e)(2), in an order similar to that of paragraph 21.3. Under such logical order, the proposed paragraphs 21.165(e)(1) would become a new paragraph 21.165(e)(1), and the proposed paragraphs 21.165(e)(1) through 21.165(e)(3) SHOULD RESPECTIVELY BE RE-NUMBERED 21.165(E)(2) THROUGH 21.165(E)(4).	Agreed	Reverse order of subparagraphs and numbering accordingly.
038	JAA DOASCC	21.165(e)	This requirement will lead to two reports, one from the TC or STC Holder, the other from the POA Holder.	Duplication of reports may happen and cannot be avoided but it is better to receive two reports on the same event than to receive no report at all.	No
024	LABA	21.165(e)(1)	LBA would highly recommend to change the four Subparas so that they readand subsequently identified to may have deviations from the applicable design data....” This Subparas should also cover the real cases where there is a doubt if a product, part or appliance that has been released previously has a deviation from the design data in order to ensure that the doubt could be cleared by investigation of the relevant products, parts or appliances. This could also cover the current gap for “in production”- occurrences which are normally not reportable, but could have impact on the already delivered products, parts or appliances.	Gist of comment agreed	“.....and subsequently identified to have <u>possible</u> deviations from the applicable design data.....”.
78.1	Airbus Industrie	21.165(e)(3)	<u>Note concerning 21.165(e) and 21.16(i)</u> : Internal reporting is a prior condition for a possible external	Agreed	Reverse order of subparagraphs and numbering accordingly.

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			scheme and, in order to repeat that logic, the proposed paragraph 21.165(i) should be placed before the proposed paragraphs 21.165(e)(1) and 21.165(e)(2), in an order similar to that of paragraph 21.3. Under such logical order, the propose paragraph 21.165(i) would become a new paragraph 21.165(e)(1), and the proposed paragraphs 21.165 (e)(1) through 21.165(e)(3) should respectively be re-numbered 21.165(e)(2) through 21.165(e)(4).		
099	Aerospatiale-Matra airbus	21.165(e)(3)	No need to add reference to ACJ 20.XX	Not agreed. The ACJ also contains guidance on reporting between organisations	No
134.3	DGAC France	21.165(e)(3)	Where he acts as supplier to <u>another</u> products organisation, report also to that other organisation all cases where <u>he has released</u> products, parts or appliances <u>to that organisation</u> and subsequently identified to have deviations from the applicable design data (See ACJ 20.xx.)	Agreed acting as a supplier to <u>another</u> production organisation, report also to that other organisation all cases where <u>he has released</u> products, parts or appliances to that organisation and
78.2	Airbus Industrie	21.165(I)	It is suggested to add the word “internal” (to show that it is dealing with an internal scheme) and to use the word “collection” (instead of Collation”) for consistency with 21.3, so as to read: “establish and maintain an <u>internal</u> occurrence reporting scheme to enable the <u>collection</u> and assessment of”	Agreed, see also comment No. 135 below	See comment No. 135 below
135	DGAC France	21.165(I)	(i) establish and maintain, <u>in the interest of safety</u> , an <u>internal</u> occurrence reporting scheme to enable the <u>collection</u> and assessment of occurrence reports in order to identify adverse trends or to address deficiencies. <u>This system shall include</u> evaluation of known and relevant information relating to the occurrences and promulgation of such related information <u>in particular the assessment and extraction of the occurrences to be reported under JAR 21.3(b)</u> . See ACJ 20.xx)	Agreed	(e) establish and maintain an <u>internal</u> occurrence reporting system <u>in the interests of safety</u> , to enable the <u>collection</u> and assessment of occurrence reports in order to identify adverse trends or to address deficiencies, <u>and to extract reportable occurrences</u> . This system shall include evaluation of relevant information relating to occurrences and the promulgation of related information. (See ACJ 20.xx)
239	CAA-UK	21.165(I)	item 9 should be identified as “JAR 21.165(i)” and the newly introduced sub-para (i) should be quoted in the proposal.	Agreed	Add (i)
020	BAE Systems	21.165(I)	Requirement is written in the context of an operational environment. The prime responsibility should to be report production deficiencies to the relevant approved design organisation.	Gist of comment agreed. Due to other comments the subparagraph has been rewritten more in line with the production perspective.	No.