

ACJ #	Comm ent #	Comment	Response
	08 C A A 0 1	In many places reference is made to "national authority" "the Authority" and "NAA", with all these references it seems intended to mean the same thing. It would help clarity and avoid confusion if one term only was used consistently throughout. For example ACJ No.2 to 21.121 refers to Authority; ACJ No.1 to 21.125 refers to NAA; and ACJ 21.126(a)(1) refers to national Authority.	Authority means JAA authority National authority is not a JAA authority. NAA will be avoided as much as possible, it will be used only when its meaning is obvious from the context.
	08 C A A 0 3	In many places reference is made to "design organisation", "design holder", "design approval holder" and TC/STC holder to mean the same thing. It would avoid confusion if one term was used consistently throughout.	Comment has been accepted, text was screened to ensure proper wording in the text. When changes to the text affect Subpart G ACJ material the necessary changes have been postponed to JAR 11 consistency review.
2	03 C A A	The first bullet point of section 2 states that 'applicants for subpart F may have had no previous production experience or inspection structure'. The applicant is required however to develop and implement a 'Production inspection System'. It is unreasonable to expect an NAA to perform 100% inspection and verification, and considering the final bullet point of section 2 states 'the responsibility for conformity to the applicable design data and condition for safe operation retains with the manufacturer', production and inspection <u>competency</u> would be needed. Consequently clarification is sought on the eligibility for subpart F.	It is not the intend of Subpart F to replace the competency of the manufacturer for production and inspection by the competency of the Authority. The competence of the personnel is part of the Subpart F investigation (see ACJ No. 2 to 21.126(a)(3) ,point 2 The text in the explanatory note was just to justify the extend of the ACJ material.
2	03A C A A	Eligibility. It is not clear from the ACJ how an applicant who has had no production experience or inspection structure in place before setting up the required inspection system, would have the necessary competence to assume responsibility for ensuring conformity with applicable design data and/or the condition of goods/parts etc. Clarification has been sought.	See above. The letter of agreement is supposed to be issued only when the Authority is satisfied.
ACJ 21.121 (a) No 2	12 D G A C	Delete the whole text and replace by a reference to ACJ 21.131 (JAR 21-G) which applies in this case, replacing : - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F". Reason (s) for proposed text /comment The requirements of JAR 21 F and G being identical, the ACJ should be identical to avoid confusing the users. Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time	Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.
ACJ 21.121 (a) No 2	31 CAA- NL	First Paragraph, first sentence (5,5 lines long) is unclear. The revered JAR 21.1(a)(5) does not exists and the meaning of "for" in "provided by the applicant for" in the second line is unclear. Shorten the sentences to make a clear statement of the intentions of this para.	Not agreed since it is was currently used without any problems as ACJ 21.131 under Subpart G 21.1(a)(5) is corrected both in Subpart G and F

<p>ACJ 21.121 (b)(1)</p>	<p>10 LBA</p>	<p><u>PROPOSED TEXT/COMMENT:</u> The following terms should be defined more clearly: - no flow production - simple technology - "crafted" product - very small organisation</p> <p><u>Reason(s) for proposed text/comment:</u></p> <p>To classify these terms in relation to the application of Subpart G, taking into account the standardisation objective for the application of Subpart F within the JAA.</p>	<p>The comment has been accepted and new wording to clarify the intended scope of activity was added. "crafted" has been taken out since its intent was already covered by the other bullets.</p>
<p>ACJ 21.121 (b)(1)</p>	<p>13 D G A C</p>	<p>1 Modify text as indicated below (deleted text crossed-out, added text underlined): The issue of an <u>letter of agreement of production</u> under this Subpart F may be agreed...</p> <p>2 Delete the whole text of the bullet numbered 1 and replace by a reference to ACJ 21.133 (a) (JAR 21-G) which applies in this case, replacing :</p> <ul style="list-style-type: none"> - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F". <p>3 Modify text as indicated below (deleted text crossed-out, added text underlined): In making this determination the Authority <u>will may</u> take into account, <u>among other</u>, one or a combination of the following parameters: very small organisation, <u>temporary authorisation</u>, <u>production without quality management system</u>.</p> <p><u>Reason (s) for proposed text /comment</u></p> <p>1 for consistency in the rest of these ACJ, the "letter of agreement of production" should be introduced here,</p> <p>2 the eligibility of JAR 21 F being exactly the same as in JAR 21 G, the ACJ should be identical to avoid confusing the users. Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time,</p> <p>3 JAR 21-F being used when JAR 21-G cannot be (for many different reasons) a maximum of flexibility should be left to the NAA to decide when JAR 21-F is appropriate, In addition, the main reasons for applying JAR 21-F have been left out (temporary authorisation and production without quality management system)</p>	<p>1 accepted 2 Not accepted, for two reasons. It is too complicated to make references only to specific parts of an ACJ to Subpart G. In addition Subpart G and Subpart F cannot be considered to cover the same manufacturing environment. 3 mostly accepted: temporary authorisation is covered by ACJ21.121(b)(2); production without quality management system is now explained as reason to decide for Subpart F.</p>
<p>ACJ 21.121 (b)(1)</p>	<p>32 CAA-N L</p>	<p>2 In making this determination the Authority will take into account one or a combination of paramaters such as the following:</p> <p>Third bullet: What is the meaning of a "crafted" product? Does this come anywhere near a real product? The original sentence suggests that these parameters are the only parameters, and does not leave any room for alternative considerations.</p>	<p>Partially accepted, "crafted" product has been deleted see comment LBA 10. Amateur built aircraft must be considered to fall outside the JAR 21</p>

		In the case of a crafted product is a real product, we think that a Subpart G production approval is necessary, for an amateurbuild aircraft or other nitty gritty parts the current ACJ material to Subpart F is a tremendous overkill.	
ACJ 21.121 (b)(2)	08 C A A 0 4	ACJ 21.121(b)(2) 1st paragraph change to read ' <i>... Subpart G, i.e. <u>a transient phase to establish the necessary document quality system a transient, the Authority may....</u></i> '	Text improved
ACJ 21.121 (b)(2)	14 D G A C	Modify text as indicated below (deleted text crossed-out , <u>added text underlined</u>): a transient phase the Authority may agree to use Subpart F for a limited period (recommended maximum period of one year). <u>Reason (s) for proposed text /comment</u> It does not seems suitable to recommend a maximum duration. JAR 21-F should be flexible. It should be left to the Authority to decide what is the most appropriate duration. Any recommendation for a maximum duration, if necessary, should be introduced in joint implementation procedures and not in the JAR itself. A better way to limit the use of JAR 21-F is to introduce a termination date (Cf. comment on ACJ n° 2 to 21.125)	Accepted, JIPs will be modified accordingly
ACJ 21.121 (b)(2)	33 CAA NL	1. Second line first paragraph: the necessary documented quality 2. The note unnecessarily emphasises on JTSO and JPA, this is also the case for products.	1 accepted and corrected. 2 accepted text changed. Changes to Support O and P still to be processed.
ACJ 21.122	08 C A A 0 5	ACJ 21.122 last paragraph. Change TC/STS/JTSO to TC/ <u>STC</u> /JTSO.	Accepted
ACJ 21.122			
ACJ 21.122	08 C A A 0 6	ACJ 21.122 last paragraph, last sentence. <i>The acknowledgement should...</i>	agreed
ACJ 21.122	15 D G A C	Delete the whole text and replace by a reference to ACJ 21.133 (b) (JAR 21-G) which applies in this case, replacing : - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F". <u>Reason (s) for proposed text /comment</u> The requirements of JAR 21 F and G being identical on the links with the design approval holder, the ACJ should be identical to avoid confusing the users. Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of	Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.

		ACJs will evolve consistently over time.	
ACJ 21.122	34 CAA NL	1: Better to speak of the manufacturer in par 4 and 6, namely the manufacturer under subpart F 2. Add new para "9: The identification of responsible person who controls the above." 2. To bring this ACJ in line with ACJ 21.133(b).	1 accepted 2 accepted
ACJ 21.124	08 C A A 0 7	ACJ 21.124 Title has incorrect reference. Should read 'See JAR 21.124'	corrected
ACJ 21.124	16 D G A C	1 Delete the reference to form 60 in the first sentence and recommend the use of a modified form 50 (deleted text crossed-out , <u>added text underlined</u>) : JAA-Form-60 An application form should be obtained from the Authority and completed by the applicant. 2 Modify form 50 adding a third box on the top right corner : "application for a letter of agreement of production" 3 this paragraph should be "acceptable means of compliance", not "interpretative material" Reason (s) for proposed text /comment For simplicity and consistency, when possible, existing JAR 21-G forms should be used. The number of JAA forms should be limited. In this case, form 50 only requires a minimal modification, and, in the interim period while it is being modified, a standard form 50 may be used specifying : "application for a letter of agreement of production".	Understood, but changing Form 50 at the present stage may create an additional burden. It is not forbidden for a NAA to make a combination of Form 50 and 60 as long as the intention of the Forms themselves is retained. 3 Understood kept as is for consistency with Subpart G will be part of the JAR 11 consistency review..
ACJ 21.124 (b)	08 C A A 0 8	ACJ 21.124(b) 1st sentence. Change to read 'In At <i>this early stage not <u>provision of the complete Manual is <u>not</u> necessary</u>.....</i>	Accepted
ACJ 21.124 (b)	17 D G A C	1 Modify text as indicated below (deleted text crossed-out , <u>added text underlined</u>) : 1 Table of Contents of the Manual 2 Description of items to be manufactured_ (<u>including quantities /deliveries</u>) 3 List of possible suppliers 4 General description of facilities 5 General description of production means 6 Human resources 7 <u>list of existing inspection system documents or procedures</u> 2 this paragraph should be "acceptable means of compliance", not "interpretative material" Reason (s) for proposed text /comment The additions are necessary to have a better knowledge of the company and of suitability of JAR 21-F with their application. In particular, the suitability of JAR 21-G versus 21-F should be	1.2 accepted 1.7 accepted under content of the manual 2 Understood kept as is for consistency with Subpart G will be part of the JAR 11 consistency review..

		studied.	
ACJ 21.124 (b)	35 CAA NL	Add an number 7: General description of processes used in manufacturing To give a general insight in this stage of the application.	Understood but considered covered by 5
ACJ 21.125 (a)	08 C A A 0 9	ACJ 21.125(a) Last bullet point. Change as follows "... but due regard allowance may be made for further testing "	Agreed
ACJ 21.125 (a)	20 D G A C	Text is OK as guidance material, but does not seem to relate to 21.125. Would be better located as an ACJ to 21.126	Understood, will be renumbered to ACJ No2 to 21.125(b) which introduces the requirement for test.
ACJ 21.125 (b)	21 D G A C	Modify text as indicated below (deleted text crossed-out , <u>added text underlined</u>) : The manual referred in JAR 21.125(b) should include, at least <u>the following items. The order of exposition may be different</u> : <u>Reason (s) for proposed text /comment</u> The order of the list does not appear to follow any standard. It is therefore proposed to allow for a different order of the chapters in the manual.	Accepted, text changed
ACJ 21.125 No1	18 D G A C	1 Modify text as indicated below (deleted text crossed-out , <u>added text underlined</u>) : Individual means that each part number or type of item (i.e. product, part or appliance) to be produced should be specifically referenced in a letter of agreement from the NAA, <u>either directly or through a list</u> . More than one part number or type of item may be referenced in such a letter. The letter will also specify the total number of items covered by the agreement. 2 this paragraph should be "acceptable means of compliance", not "interpretative material" <u>Reason (s) for proposed text /comment</u> The letter of agreement of production should not be re-issued with any change of the "capability list" of the manufacturer. When applicable, it is therefore suitable that all P/N are contained in a "capability list", quoted in the letter of agreement, but not on the letter itself. For the same reason, it does not seem practical to limit the use of JAR 21-F to a given number of items, and certainly not on a mandatory basis (the letter will also specify"...). A time limitation seems more appropriate (See comment on ACJ n° 2 to 21.125).	1 Partially accepted because the purpose of this ACJ is to provide interpretative material for the meaning for individual. 2 Not accepted see above
ACJ 21.125 No2	19 D G A C	Modify text as indicated below : It should be understood that a letter of agreement remains valid only while the production arrangements as described in the manual and accepted by the Authority at the time of the issue of the letter of agreement remain unchanged. <u>In addition, the NAA may specify a termination date.</u> There is a need to introduce a flexible time limitation for the use of JAR 21-F (Cf. Comments on ACJ	Accepted

		21.121 (b) (2) and on ACJ n° 1 to 21.125).	
ACJ 21.125 No3	19A D G A C	<p>Add the following text in an ACJ n° 3 to 21.125 : The letter of agreement of production should allocate an agreement reference number to the manufacturer for the purpose of completing forms 52 and forms 1 according to ACJ n° 1 and 2 to JAR 21.130 (b) respectively.</p> <p>Reason (s) for proposed text /comment</p> <p>1 There is a strong need to identify, by a reference number, at national and JAA level after standardisation, the holder of a letter of agreement of production, in particular for the identification of forms 52 and forms 1.</p> <p>2 A separate ACJ is proposed for the sake of clarity and to avoid mixing different topics in the same ACJ.</p>	Understood, this is considered JIPs material and will be taken into account in relation to the final decision concerning comment number 29
ACJ 21.126 (a)(1)	08 C A A 0 2	ACJ 21.126(a)(1) paragraph 5 uses "national authority" and "foreign authority" to mean the same thing. It would avoid confusion if one term was used consistently throughout.	Understood from a general point of view. In this context there is no risk of confusion. At present text unchanged for consistency with Subpart G.
ACJ 21.126 (a)(1) to ACJ 21.126 (b)(6)	22 D G A C	<p>Delete the paragraphs ACJ 21.126 (a) (1) to ACJ 21.126 (b) (6) and publish them elsewhere as technical guidance material or similar.</p> <p>Reason (s) for proposed text /comment</p> <p>Although interesting technical material, the level of detail provided in the above referenced sections is not consistent with the one of an ACJ and with all the ACJ's of JAR 21. This applies in particular to the ACJ's to JAR 21-G. In addition, publishing such a high level of detail in an ACJ may turn information material into prescriptions. Furthermore, this publication may also hinder the natural evolution of industry towards better and more up-to-date quality management methods, such as those described in recognised international standards.</p>	Not accepted, the most of the material is equivalent to the Subpart G ACJ material. To facilitate transition from Subpart F to Subpart G a new ACJ to 21.126 permits the use of Subpart G ACJ to comply with Subpart F
ACJ 21.126 (a)(2)	08 C A A 1 0	ACJ 21.126(a)(2) 1st paragraph. The intent of the words ' ... <i>that the accompanying documentation is that prescribed and that the state of configuration and of conservation is that laid down....</i> ' is not clear. If the intended meaning is that on delivery, incoming parts and materials should have the correct accompanying documentation and that the configuration and condition of the parts or materials complies with that documentation, then the following words are suggested. ' ... <i>that the incoming parts and materials have the appropriate and correct accompanying documentation and that the configuration and condition of the parts or materials is as laid down in that documentation</i> '.	Accepted for improvement of wording
ACJ 21.126 (a)(2)	36 C A A N L	Move all text after "All parts and materials coming from external parties should be identified." To a new ACJ 21.126 (a)(1). Incoming parts and material inspection. JAR 21.126(a)(2) only deals with identification, JAR 21.126(a)(1) deals with inspection.	Understood but the text is unchanged. The two concerned ACJ's are closely related. ACJ 21.126 (a)(1) was developed to provide general information on the control of supplied parts. ACJ 21.126 (a)(2) is explaining what activity is behind the identification of the incoming parts
ACJ 21.126	08 C	ACJ No. 1 to 21.126(a)(3) 1st paragraph. Change to read ' <i>It is</i> the responsibility of..'	Accepted

(a)(3) No1	A A 1 1		
ACJ 21.126 (a)(3) No2	08 C A A 1 2	ACJ No.2 to 21.126(a)(3) Paragraph 2. Change f.e to e.g.	Accepted
ACJ 21.126 (a)(3) No2	08 C A A 1 3	ACJ No.2 to 21.126(a)(3) Paragraph 4. Should read '....tasks....'	Accepted
ACJ 21.126 (a)(4)	08 C A A 1 4	ACJ 21.126(a)(4) Paragraph 1. ' the right <u>correct</u> transcription...'	Accepted
ACJ 21.126 (a)(4)	08 C A A 1 5	ACJ 21.126(a)(4) Paragraph 2. Last sentence '....part or appliance for the purposes of stating <u>the</u> conditions for safe operation and <u>for</u> issuing a..... '	Partially accepted plural is not in line with the rule
ACJ 21.126 (b)(1)	08 C A A 1 6	ACJ 21.126(b)(1). In addition to a previous editorial comment correcting the title reference to this paragraph, this ACJ also refers to the "responsibility" of the Production Inspection System. This is wrong, since <i>people</i> are given responsibility, not <i>systems</i> . Instead it would be better to say "The purpose of the Production Inspection System is to ..."	Accepted
ACJ 21.126 (b)(1)	08 C A A 1 7	ACJ 21.126(b)(1). Last paragraph. Change as follows "... if damaged, <u>they</u> could compromise...'	Accepted
ACJ 21.126 (b)(1)	08 C A A 1 8	ACJ 21.126(b)(1) Incorrect title reference. 'See JAR 21.126(a)(4) (b)(1).	Accepted
ACJ 21.126 (b)(1)	08 C A A 1 9	ACJ 21.126(b)(1) 1st Paragraph. ' ... suitable points in -during production...'	Accepted
ACJ 21.126 (b)(1)	08 C A A 2 0	ACJ 21.126(b)(1) Last paragraph. ' ... damaged, <u>they</u> could	Accepted
ACJ 21.126 (b)(4)	08 C A	ACJ 21.126(b)(4) second paragraph. '.... or parts <u>should</u>	Accepted

	A 2 1		
ACJ 21.126 (b)(5)	08 C A A 2 2	ACJ 21.126(b)(5) Paragraph 1. Should read 'The procedure should permit to record the recording of any deviation, its presentation to present it to the Design HolderJAR 21.122 and to record the recording of the results of the review and subsequent actions taken consequently as regards.....'	Accepted
ACJ 21.127	04 C A A	Most of the ACJs are procedural. However, JAR 21.127 Tests: aircraft, calls up specific flight tests and there is surely a need for further guidance to this requirement. The CAA would like an assurance that an ACJ 21.127 will be developed in the near future. CAA would also wish to be involved in any study groups developing this ACJ material, and the development process.	Agreed, wording to identify responsibility with design organisation has been added. The functional test issue for all products will be addressed at CST level with the proposal to establish an Ad-hoc working group covering the issue for both Subpart F and G
ACJ 21.128 No1	08 C A A 2 3	ACJ No. 1 to 21.128 second bullet point. Delete the symbol '-' in front of both occurrences of the word 'thrust'.	Accepted
ACJ 21.128 No1 and 2	23 D G A C	Propose to delete paragraph The functional tests required for an engine or propeller release are determined by the holder of the design approval for such products. The description and approval of these tests is covered by the design approval of these products, which is not addressed by JAR 21-F. As a consequence, these requirements are ill placed and should be deleted.	Understood but not accepted, change to the text made to introduce reference to design organisation and increase flexibility. However the functional test issue for products will be addressed at CST level with the proposal to establish an Ad-hoc working group.
ACJ 21.128 No1 and 2	23 D G A C	Propose to delete paragraph The functional tests required for an engine or propeller release are determined by the holder of the design approval for such products. The description and approval of these tests is covered by the design approval of these products, which is not addressed by JAR 21-F. As a consequence, these requirements are ill placed and should be deleted.	Understood but not accepted, change to the text made to introduce reference to design organisation and increase flexibility. However the functional test issue for products will be addressed at CST level with the proposal to establish an Ad-hoc working group.
ACJ 21.129(c)	08 C A A 2 4	ACJ No.3 to 21.129(c). Bullet point 7. Change to read 'A record airworthiness. These for example could be furnishing or BFE items.....'	Understood. Minor comment text unchanged for consistency with Subpart G
ACJ 21.128 No3	24 D G A C	Propose to delete paragraph The level of detail of this ACJ is inconsistent with the level of detail of JAR 21-G ACJ's. Furthermore, it is unnecessarily prescriptive and possibly against present and future technical state of the art. This applies in particular to the recommendation of "internal inspections of engines".	Understood but not accepted, change to the text made to introduce reference to design organisation and increase flexibility. However the functional test issue for products will be addressed at CST level with the proposal to establish an Ad-hoc working group.
ACJ 21.129 (c) No2	25 D G A	Delete the whole text and replace by a reference to ACJ n° 2 to 21.165 (c) (JAR 21-G) which applies in this case, replacing : - "sub-part G" by "sub-part F",	Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.

	C	<p>- "production organisation approval holder" by "manufacturer producing under this sub-part F".</p> <p>Reason (s) for proposed text /comment</p> <p>The requirements of JAR 21 F and G being identical, the ACJ should be identical to avoid confusing the users. Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time.</p>	
ACJ 21.129 (c) No3	26 D G A C	<p>Delete the whole text and replace by a reference to ACJ n° 3 to 21.165 (c) (JAR 21-G) which applies in this case, replacing :</p> <ul style="list-style-type: none"> - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F". <p>Reason (s) for proposed text /comment</p> <p>The requirements of JAR 21 F and G being identical, the ACJ should be identical to avoid confusing the users. Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time.</p>	Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.
ACJ 21.130 (b) No1	05 C A A	<p>ACJ No. 1 to 21.130(b) 2 General. No layout of statement of conformity is attached.</p>	Accepted, The Form 52 will be added in the final version of the the NPA 21-29
ACJ 21.130 (b) No1	08 C A A 2 5	<p>ACJ No.1 to 21.130(b) section 3. Block 17. Reference to ACJ material to JAR 21.127 is made, which does not exist.</p>	Accepted, the ACJ has been created, see CAA-UK comment 4
ACJ 21.130 (b) No1	27 D G A C	<p>1 Delete the whole text and replace by a reference to ACJ 21.163 (a) (JAR 21-G) which applies in this case, replacing :</p> <ul style="list-style-type: none"> - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F", - the description of block 14 as proposed in the ACJ n° 1 to 21.130 (b), <p>2 the description of block 21 should be modified as follows (deleted text crossed out, <u>added text underlined</u>) :</p> <p>Block 21 For production under this Subpart F, "N/A. SEE BLOCK 14" should be quoted. The reference of the JAR 21-F agreement for production should be entered in this block.</p> <p>Reason (s) for proposed text /comment</p> <p>1 The requirements of JAR 21 F and G being identical, the ACJ should be identical to avoid confusing the users. In particular, the meaning of a JAA form 52 is identical irrespective if its issued under JAR 21-F or JAR 21-G.</p> <p>Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time.</p> <p>2 There is a strong need to identify, by a reference</p>	<p>1 Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.</p> <p>2 Two variants were developped. according to the DGAC comment 29 for variant No. 1 the comment has not been accepted to reduce the risk of confusion between Subpart G and Subpart F release. Accepted for variant 2.</p>

		<p>number, at national and JAA level after standardisation, the holder of a letter of agreement of production. Such a referencing system should be described in joint implementation procedures.</p> <p>The holder of an agreement of production should be identified by its reference on the form 52 (Cf. comment on ACJ 21.125, proposed third ACJ).</p>	
ACJ 21.130 (b) No2	08 C A A 2 6	ACJ No.2 to 21.130(b) section 3. Block 4. Why is the wording underlined, it seems unnecessary. What emphasis is intended?	Accepted, was editorial mistake. Underlining will be cancelled
ACJ 21.130 (b) No2	08 C A A 2 7	ACJ No.2 to 21.130(b) section 3. Block 14. Why is the wording underlined, it seems unnecessary. What emphasis is intended?	Accepted, was editorial mistake. Underlining will be cancelled
ACJ 21.130 (b) No2 First set of comments	28 D G A C	<p>1 Delete the whole text and replace by a reference to ACJ 21.163 (b) (JAR 21-G), as modified by NPA 21-25 (common release certificate) which applies in this case, replacing :</p> <ul style="list-style-type: none"> - "sub-part G" by "sub-part F", - "production organisation approval holder" by "manufacturer producing under this sub-part F", <p>2 the description of block 16 should be modified as follows (deleted text crossed out, <u>added text underlined</u>) :</p> <p>Block 16 For manufacturing under this Subpart F, "N/A. SEE BLOCK 13" should be quoted. The reference of the JAR 21-F agreement for production should be entered in this block.</p> <p>See second set of comments on this ACJ. Reason (s) for proposed text /comment</p> <p>1 The requirements of JAR 21 F and G being identical, the ACJ should be identical to avoid confusing the users. In particular, the meaning of a JAA form 1 to the users is identical irrespective if its issued under JAR 21-F or JAR 21-G.</p> <p>Ideally, only a reference to the JAR 21 G ACJ should be made, to be sure that the two sets of ACJs will evolve consistently over time.</p> <p>2 There is a strong need to identify, by a reference number, at national and JAA level after standardisation, the holder of a letter of agreement of production. Such a referencing system should be described in joint implementation procedures. The holder of an agreement of production should be identified by its reference on the form 1 (Cf. comment on ACJ 21.125, proposed third ACJ).</p>	<p>1 Fully understood, two identical separate sets of ACJs will be maintained for the same requirement. Publication will be separate to be more user friendly.</p> <p>2 Two variants were developed according to the DGAC comment 29 for variant No. 1 the comment has not been accepted to reduce the risk of confusion between Subpart G and Subpart F release. Accepted for variant 2.</p>
ACJ 21.130 (b) No2 Note 1	06 C A A	ACJ No.2 to 21.130(b) Block 21 Note 1. This paragraph contradicts the statement in Block 14.	CAA Reference wrong, comment not understood
ACJ 21.130 (b) No2	29 D G	<p>In addition to the first set of comments :</p> <p>1- Add statement of conformity by manufacturer in block 13 :</p>	Understood, a proposal will be prepared as variant 2, submitted to the JAA legal advisor before submission to the CST before any further NPA action.

<p>Second set of comments</p>	<p>A C</p>	<p>In accordance with JAR 21-F, the manufacturer certifies that these items conform fully with their applicable design data.</p> <p>Name, date, and signature of authorised person referred in JAR 21.130 (a) : .</p> <p>2- Specify that the NAA is signing in block 15.</p> <p><u>Reason (s) for proposed text /comment</u></p> <p>In JAR 21-F, the NAA validates the statement of conformity issued by the manufacturer. The NAA taking all responsibility, its signature should be in block 15 ("authorised signature") and not in block 13. On the other hand, the conformity statement of the manufacturer and its signature should be in block 13. Putting a validation statement and signature of the NAA in block 13 may confuse the end users into thinking that JAA form 1 issued under JAR 21-F have additional value (due to the NAA signature in block 13) compared with forms 1 issued under JAR 21-G where the only signature is the one of the manufacturer in block 16.</p>	<p>As a consequence of this comment a change has been introduced as regards the location for the validation of the Statement of Conformity Form 52 to demonstrate that the validation comes after signature of the manufacturer.</p>
<p>ACJ 21.130 (b)(1) No2</p>	<p>07 C A A</p>	<p>ACJ No.2 to 21.130(b). Paragraphs 1 and 2 highlight that this certificate is for the release of new parts. Clarification is sought on why paragraph 5 refers to maintenance organisations.</p>	<p>Understood, valid comment also for Subpart G and JAR 145 appendix 3. The text will be unchanged for consistency with the CRC project efforts.</p>
<p>ACJ 21.130 (c)</p>	<p>37 C A A N L</p>	<p>Second paragraph: The will then make such investigations of records and the product,..... Investigation is in general a broader term than inspection and gives the NAA a better possibility to do what is necessary to determine the correct application of the conditions set in the subpart F authorisation.</p>	<p>Accepted, investigation has been added.</p>