

## **Comment Response Document**

### **NPA 22G-74**

After circulation of NPA 22E,F,G-74 to the JSA and NPA scheme subscribers, a total of 10 comments were received:

#### **Comments received**

- ACG, Austria
- ENAC, Italy
- LBA, Germany
- CAA, United Kingdom
- BGA, United Kingdom
- JAA RAP
- CAA Hungary
- CAA Denmark
- Swedish Civil Aviation Administration
- Swedish Soaring Federation

#### **Review of comments**

- Regarding NPA 22G-74, nine commenters had no comments to offer. They agreed or accepted the proposal.
- One commenter suggested the following sentence to be added to the proposed text:

The Airworthiness Limitations Section is approved and variations must also be approved.

Reason for the proposed text is to ensure that any airworthiness limitation is approved by the authority.

The Study Group discussed this proposal and concluded the following:

The intent of NPA 22G-74 was to gather information concerning life-limited items to one specific chapter in the maintenance manual. The intent of the commenter was to ensure that all airworthiness limitations have to be approved by the authority. This is already a requirement per JAR 22.1529 subparagraphs (n) and (o). The Study Group did not envision a need to require a separate approval. Furthermore, the Study Group believes that this was more of a procedural proposal rather than a technical issue. The Study group asked the commenter to reconsider submitting a new NPA to incorporate the above proposed text.