

#	Para	Comment Provider	Comment/Justification	Response	Resulting Text
1	4(a)	Maldivian Air Taxi	Delete "Operator shall furnish plans of training Maldivian AMEs and due justification for employing foreign personnel. Operators shall also clearly indicate their plans for phasing out the foreign AMEs"	Partially accepted Deletion of "Operators shall also clearly indicate their plans for phasing out the foreign AMEs" is accepted. However Operators will be required to provide adequate justification and their plans to train Maldivians	"4(a) The request for validation of a foreign AME licence will be considered only from Maldivian Operators when adequate numbers of such qualified personnel are not available in the country. Operator shall furnish plans of training Maldivian AMEs and due justification for employing foreign personnel."
2	4(a)		Replace "The request for validation of a foreign AME licence will be considered only from Maldivian Operators when adequate numbers of such qualified personnel are not available in the country." with "The request for validation of a foreign AME license will be considered only from Maldivian Operators / maintenance organizations, when adequate numbers of MCAR-66 license holders with appropriate experience and type rating is not available."	Not accepted "Qualified personnel" means license holders with relevant type rating and experience as specified in MCAR-66	No change
3	5(b)		Replace "Applicants must be able to reach an overall band score of at least 6.5 in the International English Language Testing System (IELTS) General." with "Applicants must be able to demonstrate that he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release are written. In this respect, International English Testing System (IELTS) General overall band score of 5 or ICAO level IV would be considered as acceptable. Should the organizations decide to use their own English assessment criteria, it has to be agreed with CAD."	Partially Accepted IELTS 6.5 was chosen for the following reasons: (a) It is envisaged that validation holders will fill the gaps which cannot be substituted with local experience. Thus, in a position to train the less experienced engineers, it is imperative validation holders have a good command of English. (b) IELTS band 7 represents a "Good" user while band 6 represents a "Competent" user. Therefore 6.5 was chosen to represent the middle ground. (c) Internal English programmes have not worked in the past with different companies using different standards. IELTS band 5 represents a 'modest' user i.e. 'has partial command of the language, coping with overall meaning in most situations, though is likely to make many mistakes.' Therefore the minimum acceptable band is set at 6.	"Applicants must be able to reach an overall band score of at least 6.0 in the International English Language Testing System (IELTS) General."
4	4(a)	Island Aviation Services	Delete "Operators shall also clearly indicate their plans for phasing out the foreign AMEs" Justification We would like to have the flexibility of keeping some foreign AME's on a permanent basis due to the following reasons. (a) Improved productivity as a result of multi-cultural working environment (b) Local AME's may lack the kind of experience gained by foreign AME's		See comment #1
5	4(b)		Replace "Ratings are only issued for aircraft types on the Maldivian register." with "Ratings are only issued for aircraft types operated Maldivian Operators" Justification This is to give flexibility for operations of foreign registered aircraft in Maldives	Noted CAD notes that this outside the scope this NPRM as leasing regulations are required prior to such requirements. Nevertheless, CAD welcomes the comment for future possible rulemaking.	

6	5(b)		<p>Replace "Applicants must be able to reach an overall band score of at least 6.5 in the International English Language Testing System (IELTS) General." with "Applicants must be able to reach an overall band score of at least 5.0 in the International English Language Testing System (IELTS) General."</p> <p>Justification It would be difficult for most people to achieve a score of 6.5 in IELTS.</p>	<p>Not accepted See comment # 3</p>	
7			<p>Add "Native speakers are exempt from the English language requirement"</p>	<p>Accepted Nationals of the following countries will be exempt: United Kingdom, Canada, New Zealand, United States of America, Republic of Ireland, Australia</p>	<p>5(c) Applicants holding a valid passport from one of the following countries will be exempt from the requirements of paragraph (b). United Kingdom, Canada, New Zealand, United States of America, Republic of Ireland, Australia</p>
8	4(c)		<p>Delete ""The FAA A&P Certificate, or other ICAO state Certificates based on the FAA Certificate, are not recognised."</p> <p>Justification IASL is working on induction of a US Manufactured Aircraft, it is very likely that we would be forced to recruit engineers with FAA A&P Licence. Hence, it is important to recognise FAA licence with additional requirements, if necessary.</p>	<p>Noted The primary requirement for a validation is a valid license issued by an ICAO contracting state in accordance with Annex 1. FAA A&P licence does not fall into this category.</p> <p>CAD also notes that this Circular sets out the baseline for the issue of validations. In special cases, such as new operations, where the requirements of this Circular cannot be reasonably met, CAD will work with the relevant Operators and/or CAAs to provide interim arrangements.</p>	
9	4(a)	Trans Maldivian Airways	<p>Delete "Operators shall also clearly indicate their plans for phasing out the foreign AMEs"</p> <p>Justification To request validation in the event TMA needs an experienced engineer from Canada and will be based on the following. (a) An engineer is required only because of the experience which cannot be reasonably substituted by local expertise (b) The candidate will pass from IELTS exams (c) Manpower strength of TMA will be submitted with each request</p>	<p>Accepted See comment # 1</p>	
10	5(b)		<p>Explain the source of "Applicants must be able to reach an overall band score of at least 6.5 in the International English Language Testing System (IELTS) General"</p>	<p>Noted See comment # 3</p>	

11		Individual 1	Replace "The request for validation of a foreign AME licence will be considered only from Maldivian Operators when adequate numbers of such qualified personnel are not available in the country." with "The request for validation of a foreign AME license will be considered only from Maldivian Operators / maintenance organizations, when adequate numbers of MCAR-66 license holders with appropriate experience and type rating is not available."	Not Accepted See comment # 2	
12	4	Individual 2	Licenses issued by States categorised by ICAO as States with Significant Safety Concerns not mentioned in paragraph 4	Accepted This will be included and Notice to Operators # 201-ASD-D/N/2010/01 will be repealed when this Circular becomes effective.	4 (c) The FAA A&P Certificate, ICAO state Certificates based on the FAA Certificate, and licences from ICAO states with open Significant Safety Concerns are not recognised.
13			ELGD section A9 and ASC should be in harmony as ELGD is just guidance and cannot overrule regulatory material. E.g. ASC 66-1 does not address Note 1 of ELGD section A9.	Accepted Requirements transferred to ASC 66-1 and those requirements in conflict/repeated or in Appendix IV to MCAR-145.30(j) shall be removed from ELGD.	"4 (e) Validations will be issued for a period of one year and may be renewed."
14			ELGD section A9 and the ASC 66-1 requires to meet appendix IV to MCAR-145 section 1 prior to issue of validation certificate. This not clear since the practice of CAD is that only [MCAR-66] Module 10 is required prior to issue of validation certificate. The rest (Human Factors training, experience requirements and scope of work) is checked by Quality system prior to issue of company certification authorisation.	Noted In the future these requirements will also be checked by CAD	N/A
15			Is in-house training covering the elements of MCAR-66 Module 9 sufficient to meet the requirement of Appendix IV to MCAR-145.30(j) para (c)?	Noted Provided the in-house training covers the elements of MCAR-66 Module 9 it will be accepted.	N/A
16			ASC 66-1 para 4(b) will result in issue of ratings on all aircraft types on the Maldivian registry or just the ones the current employer of validation holder is operating?	Noted Scope will be limited to aircraft types operated by the sponsoring AMO	N/A