

#	Para	Comment Provider	Comment/Justification	Response	Resulting Text
1	147.A.105	TMA	Include a Safety Manager as it s one of the key personnel listed under EASA	Noted	Embodiment of SMS requirements into MCAR-66 and MCAR-147 is expected in the next revision. Also refer to NPA 2013-19 for EASA perspective on SMS.
2	Page 14	TMA	a TOT cert from a CAA recognized training organization must suffice and must be treated as an alternate solution meeting the same requirement.	Noted	GM 147.A.105(f) refers to such instructional techniques.
3	Page 15	TMA	shall be kept ..... rather than may be... having a single source for keeping records will streamline the activities.	Not Accepted	AMC 147.A.110(2) was intended to give flexibility to the training school on how they meet 147.A.110(a).
4	147.A.125	TMA	not all records can be maintained for an unlimited period. a compromise is required unless soft copies are acceptable to CAA.	Noted	Soft copies are an acceptable method of storing records.
5	147.A.130	TMA	AMC 147.A.130(b)2 refers to CAD	Accepted	CAA
6	147.A.135	TMA	147.A.135(c) refers to the competent authority	Accepted	CAA
7	147.A.140(c)	TMA	Possibly not a good idea. All revisions made to the MTOE must be shared with and approved by CAA.	Not Accepted	The intension is to give indirect approval in the same manner as in MCAR-145. E.g. list of certifying staff.
8	Page 41	TMA	or the avionics courses	Noted	No changes

#### Terminology

<b>Accepted</b>	The CAA agrees with the comment and any proposed amendment is wholly transferred to the revised text
<b>Partially accepted</b>	The CAA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
<b>Noted</b>	The CAA acknowledges the comment but no change to the existing text is considered necessary.
<b>Not Accepted</b>	The comment or proposed amendment is not shared by the CAA.