

#	Para	Comment Provider	Comment/Justification	Response	Resulting Text
1	NA	Mega Maldives	NPRM form is not working properly. When a word or sentence is written it automatically appears everywhere (i.e. in all the text boxes).	Accepted	No changes to the regulation.  Correct NPRM form uploaded to the website.
2	66.A.3(a)	Mega Maldives	MCAR-66.A.3(a) B3 license is not specified. That is different from EASA Part 66.A.3(a). Maybe this is a mistake (i.e. typo) in MCAR-66	Accepted	Inserted "Category B3"
3	66.A.20(a)	Mega Maldives	MCAR-66.A.20(a)3(ii) is reserved but I think it should not be since this does not take into account the changes to module 13. EC 1149/2011 extended B2 privileges to include limited and simple tasks on mechanical system. Module 13 has been expanded for B2 to include 180 questions with time allowed 3 hrs 45 mins. These information was given by Eric Mills during 147/66 training. Also this is within the limits of tasks specifically endorsed on the certification authorisation in 145. Therefore, please do not remove this privilege from B2	Accepted	Included "ii. to issue certificates of release to service following minor scheduled line maintenance and simple defect rectification within the limits of tasks specifically endorsed on the certification authorisation referred to in MCAR-145.A.35 . This certification privilege shall be restricted to work that the licence holder has personally performed in the maintenance organisation which issued the certification authorisation and limited to the ratings already endorsed in the B2 licence."
4	66.A.70	Mega Maldives	GM.66.A.70 (1) second sentence starting with "This should not been mistaken....." should not be removed as MCAR-M does have the provision to issue ARC privilege although it has not been issued yet. Therefore, this para should not be removed.	Not Accepted	No changes to the regulation.  There were no responsibilities linked to "airworthiness review" before the initial issue of MCAR-66.
5	66.A.70	Mega Maldives	GM 66.A.70 (2) the examples are deleted. These should not be deleted as this illustrate the meaning of the provision GM 66.A.70(2)	Not Accepted	No changes to the regulation.  The two points (a) holding a national licence and (b) having completed a qualification process are included. The last example (c) having completed a certifying staff qualification process at a maintenance organisation was not included since this was not practiced in the Maldives.
6	Appendix I to AMC (Type Rating List)	Mega Maldives	First few paragraphs under "Appendix I Aircraft Type Ratings for MCAR-66 Aircraft Maintenance Licence" is deleted and CAA comment states "This list includes only aircraft type accepted in the Maldives.". This is not acceptable as some local airlines (e.g. IASL and Mega) does provide maintenance support at MLE for foreign airlines. If Maldivians are unable to endorse types of aircraft not registered in Maldives, then the local AMO might have to rely solely on expatriate engineers to support aircraft types operated by foreign airlines. A second reason is that an aircraft type handled in MLE by us but not registered in Maldives today might be registered later. If we now develop engineers with more types, then it will be easy to introduce new types. A third reason might be that having more types is an advantage for Maldivians who might go abroad to work	Not Accepted	No changes to the regulation.  This issue was discussed in the Safety Review Group and the Group decided since Type Acceptance forms the basis for the continuing airworthiness activities defined in MCAR-66. A licence cannot be issued for a type when we have not issued a Type Acceptance Certificate.

7	Appendix II to MCAR-66 (Basic Exam Standard)	Mega Maldives	Appendix II Basic Examination Standard, paragraph 1.11 states that exam re-sit period can be reduced from 90 days to 30 days if a retraining course is done for failed module by MCAR-147. Since we do not have MCAR-147 organisation conducting courses on module 10, it maybe better to incorporate the exemption (EXE/66-1) to the regulation MCAR-66.	Not Accepted	No changes to the regulation.
8	66.A.20(a)	TMA	Paragraph 2, 3, 4 does not include troubleshooting.	Noted	The definition of maintenance includes troubleshooting
9	66.A.20(a)	TMA	Paragraph 3 on the privileges of category B2 AML holders states "only simple" tests on mechanical and powerplant system to prove their serviceability. There is concern that the term "only simple" would preclude B2 category license holders from issuing CRSs for tasks requiring detailed testing or troubleshooting on these systems. As an example, would a B2 certification authorization holder be able to issue a CRS for calibration or troubleshooting defects of electrical engine indicating systems?	Noted	<p>Electrical privileges can be divided into 3 categories. (a) Electrical items on mechanical and powerplant systems, (b) electrical items on avionics systems and (c) items that are common to both (b) and (c).</p> <p>A B2 certifying staff cannot release work done on electrical items in mechanical and powerplant systems except for "simple test" tasks.</p> <p>The ATAs common to B1 and B2 can easily be identified using MCAR-66 Appendix III to the regulations para 3.1 training syllabus. Common ATAs are where it shows training up to level 3 for both B1 and B2. If the training level is not 3 then the corresponding category staff cannot release that work.</p> <p>E.g.. ATA 28 for B1 is level 3 but for B2 is level 2. Therefore B2 staff cannot release work under this ATA.</p> <p>ATA 77 is level 3 for both B1 and B2. Therefore can be released by either.</p>
10	66.A.20(a)	TMA	Would "only simple" words preclude the B2 certifying staff from issuing CRSs for tasks such as T5 Indication system calibration?	Noted	Refer comment number 9.
11	66.A.20(a)	TMA	Category B2 scope shall also include troubleshooting of electrical and avionics systems (as this is not covered in either B1 & B3 scopes)	Not Accepted	The definition of maintenance includes troubleshooting
12	66.A.20(a)	TMA	GM 66.A.20(a) describes definitions of maintenance and includes a statement regarding performing base maintenance tasks (ADs, SBs, etc.) under line maintenance conditions. The statement does not give a document or reference for the CAA prescribed conditions under which these types of tasks may be performed.	Noted	The definition of line maintenance and base maintenance included in MCAR-66.
13	66.A.30	TMA	Suggest keeping the skilled worker provision as it provides a more attainable path for many in the Maldives who are unable to travel abroad to 147 training schools. Request CAA to provide more guidance on what "training considered relevant by CAA" means. This would curb misuse and provide clarity.	Accepted	No changes

14	Appendix II to MCAR- TMA 66 (Basic Exam Standard)		There is concern about when this requirement will be implemented and its impact on people who have already sat for a module for multiple attempts. When will this requirement be implemented? What about for people who have made three attempts on a module already? Will they need to wait 1 year after this revision enters force? Will current provisions change for the way Maldives CAA's Module 10 exams are presently conducted?	Noted	The requirements of Appendix II will be implemented except for EXE/66-1
15	66.A.20(b)	TMA	AMC 66.A.20(b)3 - It refers to Part-66 instead of MCAR-66	Accepted	References changed to "MCAR-66"
16	Appendix II to MCAR- IASL 66 (Basic Exam Standard)		Since there is no MCAR-147 approved organisation in the Maldives, we would like to propose to allow MCAR-145 organisations to conduct the training. Otherwise we will face difficulties with Module 10 examinations.	Noted	The CAA can consider "direct approval" of such programmes to align them with MCAR-66
17	Appendix I to AMC (Type Rating List)	IASL	All aircraft listed in EASA type ratings list to be added to the list. We have a requirement to apply for type ratings for aircraft which does not have CAA type acceptance certificate.	Not Accepted	Refer comment number 6.
18	GM 66.A.70	AGO	There should be an effectivity date for conversion of B3 licences.	Accepted	Effectivity date of "31 December 2015" inserted.

#### 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.