

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1.	-	IASL	Acceptable without changes	<u>Noted</u>	NA
2.	-	Villa	No response	NA	NA
3.	-	Manta	No response	NA	NA
4.	MCAR-145.A.90	TMA	<p>The proposal is acceptable but would be improved if the following changes were made:</p> <p>Suggesting for perpetual approval without any expiry for MCAR-145 approval.</p>	<p><u>Not Accepted</u></p> <p>Firstly, the renewal process places a limited administrative burden and no financial burdens on the organisation. The burden of the renewal process mainly lies with the CAA and thus this regulatory provision has limited impact on the approved organisation.</p> <p>Secondly, the renewal process has a slightly positive safety impact as most organisations are more mindful of finding management as this is linked to the approval.</p>	No Change.
5.	AMC2 145.A.95	TMA	<p>The proposal is acceptable but would be improved if the following changes were made:</p> <p>Suggest to remove observation and keep Level 1 & 2 findings only to streamline as per MCAR-CAMO.</p>	<p><u>Partially Accepted</u></p> <p>Observations will only be used for management system assessments and potential non-conformances related to the management system in MCAR-145 audits.</p>	No Change to the Regulation. SOP amendment.
6.	AMC1 145.A.42(a)(i)	TMA	<p>The proposal is acceptable but would be improved if the following changes were made:</p> <p>To include CASA Form 1 as equivalent for CAA Form 1 in the list referred in AMC1 M.A.501(a)1.</p>	<p><u>Not Accepted</u></p> <p>The CAA only accepts Form 1s from countries with aircraft for which we have issued type acceptance certificates. Type acceptance creates a formal relationship between the State of Design and the State of Registry. The CAA has not issued a Type Acceptance Certificate for an aircraft type certified by Australia and hence they have no formal obligations as a State of Design.</p>	No Change

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				Also refer to comment # 2 of the CRD to MCAR-21 Issue 3 (NPRM 2019-02).	
7.	AMC1 145.A.35(d)(4)	TMA	The proposal is acceptable but would be improved if the following changes were made: The elements, general content and length of such training should be specified in the MOE, or may be cross reference to any internal document.	<u>Not Accepted</u> This is left as is to standardise with EASA Part-145. Further HF training is also a requirement under ICAO Annex 8.	No Change

Terminology

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