

#	Para	Comment Provider	Comment / Justification	Response	Resulting Text
1	6.2	TMA	FOO / Flight Dispatchers will need to hold a Air Crew License and Medical. This does not seem to apply to "Assistant FOO / Flight Dispatcher". – may not be applicable to TMA	Noted. The requirements are for individuals who wish to obtain a licence. Not Applicable to TMA. Note that the medical requirement as per 6.3 of ASC Aircrew 01 is only applicable to crew members.	NA
2	4.2	TMA	FOO / Flight Dispatcher training for an Aircrew license must be conducted by an ATO. Currently all FOO training is conducted by the AOC holder and is contained in OM-D. We will need to move this training syllabus over to the ATO manuals and have the ATO certificate updated to include FOO / Flight Dispatcher training. – TMA will need at least 6 months to 1 year to comply. Unless license requirements are exempted as it stands currently for seaplane Ops.	Noted. The requirements are for licensed flight operations officer/flight dispatcher.	NA
3	6.2	TMA	The FOO training syllabus has been provided in the ASC. This is similar to the Cabin Crew syllabus in Air Crew from the standpoint that the course is a "generalized" course with content that covers the broad topics for an FOO to get licensed and work at any airlines. Currently we provide a more tailored seaplane specific FOO course syllabus and content. Whether our course would be acceptable as sufficient for issue of an FOO license would need to be investigated, or at least we would need to add to our existing course, any missing content that is stated in the ASC syllabus. - TMA will need at least 6 months to 1 year to comply. Unless	Noted. Refer to the response to comment No.2	NA

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			license requirements are exempted as it stands currently for seaplane Ops.		
4	6.2.7	TMA	Skill based evaluation of the FOO as part of the course. There is an indication that the FOO must demonstrate competency to perform FOO tasks. This seems to be more than just a simple MCQ exam. There is a hands-on or practical demonstration requirement. Unclear how this will need to be applied. Whether on the job demonstration or a mock demonstration. In any case the demonstration criteria involve demonstration of competency or performance of tasks that are currently not part of the TMA dispatch system. Section 6.1.2 of the AMC indicates the method of demonstrating skill and competence shall be in a manner determined by MCAA, however does not indicate what that actual demonstration mechanism will be. - TMA will need at least 6 months to 1 year to comply. Unless license requirements are exempted as it stands currently for seaplane Ops.	Noted. Refer to the response to comment No.2	NA
5	-	TMA	Qualified Instructors. This will be a sticking point, as the FOO training is now attached to an Aircrew license. Who will they accept as a qualified instructor to conduct such training? There will need to be a starting point here. Will our current instructors need to first be Air Crew licensed in order to be qualified to instruct? How will they demonstrate their skill and competency for getting their license? Will there be any grandfathering or acceptance of instructors currently holding an ICAO FOO license from	Noted. Refer to the response to comment No.1	NA

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			another jurisdiction? Are current TMA FOO instructors qualified to deliver a full FOO course based on the broad base of content that is required by the training syllabus? These questions will need to be answered by MCAA as to how they envision the implementation of this program and the instructor qualifications. - TMA will need at least 6 months to 1 year to comply. Unless license requirements are exempted as it stands currently for seaplane Ops.		
6	6.3	TMA	Medical Requirements. The AMC implies that licensed FOO / Flight Dispatchers will need to complete an Air Crew medical. It does not indicate the medical period of validity. - TMA will need at least 6 months to 1 year to comply. Unless license requirements are exempted as it stands currently for seaplane Ops.	Noted. The medical requirements in ASC Aircrew 01 is applicable for Crew Members only.	No change to the Regulation

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.