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Title	Review of Part-147 — Proposed amendments
NPA Number	NPA 2023-10 (B)

ECOGAS (mg.svfb@bluewin.ch) has placed **6** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
759	AMC1 147.A.110(a) (5) Management system	29	It makes no sense avoiding SMS in 147 or make it voluntary, since safety and risk based approach is an aviation standard and should not be falsely considered only for 147. Since Module 9 is thought by the AMTO as crucial, that this is a key element for the management, instructors, examiners and students (ref also to ECOGAS Comment on .132/.135 below)! The Implementation of an SMS within Part 147 organizations is crucial.	
760	AMC1 147.A.110(a) (5) Management system	29	It is essential to standardize terms and positions with Part 145 and ATO regulation. For: - Compliance Monitoring Manager + - Safety Manager (or SMS) Possibility (with authority approval and following the same principle as Part 145) of combining roles; e.g., combining SMS and CMM	
762	AMC1 147.A.132(c) (3) Performance of training activities	54	We do agree that either the Modules (sessions) and Exams should be understood by the students accordingly and this means CEFR B2 (or native language). But if such requirements are implemented then a CEFR Level B1 would be required at least in English to be able to READ and UNDERSTAND the Maintenance Documentation and WRITE for the feedback (e.g. Technical Logbook) also to understand English material used during classes and modules (theoretical and practical).	
763	AMC1 147.A.132(c) (5) Performance of training activities	55	We think this would be covered by introducing SMS using industry standard for Human Factors, Mandatory Reporting according to AMC 20-8 and using the MEDA Tool and it's Culpability Model for appropriate action by the AMTO.	
764	AMC1 147.A.135(c) (3) Examination process	62	We think this would be covered by introducing SMS using industry standard for Human Factors, Mandatory Reporting according to AMC 20-8 and using the MEDA Tool and it's Culpability Model for appropriate action by the AMTO.	
766	147.A.500 Aircraft task training	91	Where is here the requirement for General Aviation? We do not need any 147 MTO to perform Task Training for a licensed B1.2/A1.2 Mechanic in a 145 or CAO! (ref to AMC1 145.A.35(m) Certifying staff and support staff).	