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Title	New air mobility Subtask 1 — Continuing airworthiness (CAW) rules for electric and hybrid propulsion aircraft and other non-conventional airca
NPA Number	NPA 2021-15

UK CAA (European.Affairs@caa.co.uk) has placed **5** unique comments on this NPA:

Cmt:	Segment description	Page	Comment	Attachments
164	M.A.201 Responsibilities	14	<p>Page No: 15</p> <p>Paragraph No: M.A.201(h) and M.A.201(i) - Responsibilities</p> <p>Comment: Both paragraphs include the phrase '(regardless of their use)'. Consider removing this phrase.</p> <p>Justification: This adds confusion as both paragraphs later defines uses that are applicable.</p> <p>Proposed Text: It is recommended the phrase '(regardless of their use)' is removed.</p>	
165	66.A.20 Privileges	25	<p>Page No: 25</p> <p>Paragraph No: GM 66.A.20 (a) 1 - Privileges</p> <p>Comment: The new rules show that the B2 holder will have no certification privileges in the electrical powerplant but have full certification privileges in the electrical system.</p> <p>Justification: This could lead to confusion where system demarcations are not clear, system design integrates electrical system and powerplant, and certification privileges become ambiguous.</p> <p>Proposed Text: It is recommended the related text is amended to extend the electrical propulsion privilege to B2.</p>	
166	Appendix III - Aircraft type training and examination standard - On the job training	37	<p>Page No: 37</p> <p>Paragraph No: 2.14, Module 14 - Propulsion</p> <p>Comment: The text shows the number of questions for the revised Module 14 as 30 questions, and the time allowed as 36 minutes.</p> <p>Justification: All Part 66 exams have a question count divisible by 4 to allow a 75% pass mark. The time allowed for 30 questions in accordance with Part 66 Appendix II, paragraph 1.2, is 75 seconds per question, therefore should be 37.5 minutes.</p> <p>Proposed Text: It is recommended to either increase the question count to 32 or reduce it to 28, and correct the time allowed accordingly.</p>	

Cmt	Segment description	Page	Comment	Attachments
167	ML.A.302 Aircraft maintenance programme	52	<p>Page No: 54</p> <p>Paragraph No: AMC1 to Appendix II to Part-ML (d) – Limited pilot-owner maintenance</p> <p>Comment: The NPA changes terminology within this paragraph to use ‘helicopters’.</p> <p>Justification: All other references to ‘helicopters’ have been changed to ‘rotorcraft’. This may cause confusion.</p> <p>Proposed Text: It is recommended that all references to ‘Helicopters’ are changed back to ‘Rotorcraft’ throughout the NPA.</p> <p>Other places where references are made to ‘Helicopters’ are identified below, but there may be others:</p> <p>Page 12, Footnote at Point 15 Page 14, M.A.201(f) & (g) Page 15, GM M.A.201</p>	
168	ANNEX Vc (PART-CAMO)	55	<p>Page No: 55</p> <p>Paragraph No: AMC1 CAMO.A.310(a)(d) - Airworthiness review staff qualifications</p> <p>Comment: The addition to the sentence in point (d) ‘or such that the licence holder the privilege to release the aircraft to service after maintenance’ is not coherent.</p> <p>Justification: The UK CAA believes this change is confusing. To meet the intent of the rationale, the word ‘holds’ or ‘has’ needs to be inserted between the words ‘holder and ‘the’. The rationale states that this change is intended to include ‘non-conventional aircraft’, but the wording used for the proposed change also opens up the eligibility to include holders of a category A licence which dilutes the existing qualification standard.</p> <p>Proposed Text: It is recommended the text is amended to read:</p> <p>‘a category B1 or L licence in the subcategory of the aircraft reviewed. If there is no dedicated Part-66 subcategory, the category B1 or L licence holder must hold the privilege to release the aircraft to service after maintenance.’</p>	