

#	Para	Comment Provider	Comment/Justification	Response	Resulting Text
1	N/A	MEGA	We do not believe, adequate time frame is been provided to the Operators to provide a constructive feedback. We would appreciate, to extend the comment period to at least three months (calendar) for any major change in regulation or initial issues. It has to be understood that often, changes in these regulations would have an effect on the operations, whereby operators require deliberating within the senior management and at times, with other stake holders, to provide a comprehensive feedback or comment. Furthermore, given the daily routine operations and strategic planning, operators would require adequate time to concentrate on the affected regulation changes.	Noted: The comment response period is determined after considering the impact on Industry. The CAA believes a period of one month is sufficient to comment to this NPRM. This is because (a) changes to clause MCAR-21.A.185 is the only change which has significant impact on the operators and (b) the CAA met with all major operators (including Mega Maldives) to go through all the changes proposed in NPRM.	N/A
2	21.A.185	MEGA	Para (a), we would recommend to change the wording flight crew to flight operations (i.e.; including flight support/dispatch).	Noted: MCAR-21.A.185 is to maintain type specific competence within the CAA for the aircraft types on the Civil Aircraft Register. The CAA believes that areas such as flight support/dispatch do not have much to do with the specific type. Nevertheless, CAA welcomes the comment for future possible rulemaking.	No Changes
3	21.A.185	MEGA	Mega Maldives Airlines (MMA) understands the intention of the proposed change to the regulation. However, rather than a binding requirement, we highly recommend to change the wordings to establish an apprenticeship programme for Maintenance and Flight Operations through an MOU with individual operators. Alternately, a Policy decision to address the requirement. Hence, we propose the following options. (a) CAA staff work for MMA for a period of 1-2 years under contract basis. i.e.; we shall be providing the necessary trainings to act/perform his/her duties as a flight crew/maintenance staff. He/she may be able to devote few days in a month to CAA given his duties at the airline. With this approach, we shall be able to provide trained staff to the regulator, and/or (b) CAA staff work few days a week at the airline within the flight support (dispatch) and/or CAMO to gain the live airline experience with regard to actual flight planning and technical records respectively.	Partially Accepted 1. CAA Act 2/2012 Article 5(f) requires the CAA to create a level playing field, i.e. a fair and competitive environment in the Maldivian civil aviation industry. The CAA has repeatedly tried to come to a common arrangement with the operators on training, but, failed to reach an agreement due to (a) significant disparity between the operators and (b) lack of substantial commitment. The CAA feels the financial and operational burden of initial and recurrent type training (which is what the CAA is looking for) remains the same be it through an MOU or through the regulation. 2. It is not possible for the CAA to contract out our staff on long term basis as (a) the cost to the CAA would be greater than the type training cost and (b) the manpower at CAA is limited (especially in a period where the CAA (and the industry) are undergoing significant and rapid changes). Nevertheless, CAA will consider this in the future. 3. The CAA will consider the possibility of including flight support/CAMO experience in the future	No Changes
4	21.A.185	MAT/ TMA	We agree with the content of this paragraph but it is not much relevant to MCAR- 21 regulation hence we would recommend to issue it separately as a circular or include it in MCAR-66.	Noted We acknowledge the acceptance. However, the requirements of MCAR-21.A.15(b)10 and MCAR-21.A.185 are to ensure the CAA has the competence to type accept/import a new aircraft and maintain that competence. Type acceptance / import is under MCAR-21. MCAR-66 is for licencing of engineers and targeted to a different audience.	No Changes
5	21.A.185	MAT/ TMA	(c) Each holder of a valid airworthiness certificate for a type accepted aircraft shall provide: I. A minimum of one flight duty period per week to a CAA inspector Comment – Explain “A minimum of one flight duty period per week” in detail	Noted This normally means minimum one day per week but can extend to more than one day when a particular flight does not allow return to Male' on the same day. This can also accomodate, for example, a minimum of four days per month	No Changes

6	21.A.185	IASL	Remove Para 21.A.,185 from Part21 as there is no such requirement in EASA Part21. We understand that MCAA objective is to harmonise MCAA Regulations with EASA Regulations, wherever possible.	Not Accepted Parts of MCAR-21 (such as Subpart B 'Type Certificates') are significantly different from EASA Part 21 as (a) imposition of these requirements would make current operations impossible and (b) such requirements are not appropriate for small states such as Maldives. See also comments from SARI in this regard. Alternate arrangements are built into MCAR-21 to cater for the differences to EASA Part 21 one of which is type acceptance. The CAA feels in the medium term, there will be 'significant differences between MCAR-21 and EASA Part 21	No Changes
7	21.A.185 (a)	IASL	Maintenance type training to be limited to Level 2 type training. Level 3 type training is designed for certifying staff. Additionally we can provide only one slot for maintenance and flight crew type training to CAA Inspectors and if CAA Inspector fail to get type endorsement (fight crew type) for any reason we will not take responsibility.	Not Accepted Level 3 type training is an existing requirement. Operators are not required or being asked to take responsibility to ensure completion of the training provided under this regulation. CAA would take that responsibility at all times. Operators' obligation is over once the arrangements to complete the training has been made.	No Changes
8	21.A.185 (b)	IASL	We strongly object to mandating recurrent type training requirement for CAA Inspectors by the Industry. This involves significant cost and we do not believe that the benefits out weigh the costs. As per current practice, wherever possible, opportunities will be provided to CAA Inspectors to participate in in-house training session.	Noted The CAA understands there is a financial and operational burden due this change and at the same time feels the benefits to the CAA, industry and the country as a whole, far outweighs the cost. The number of types, decision to introduce a new type, withdraw a type and when to do those largely depend on the Operator . Placing the burden of training on all these type and changes (for which the CAA has no control) is both unfair and does not make economic sense. It makes more sense to distribute the financial burden among the operators. It is also important to consider: 1. The Inspectors trained under this regulation will also provide a minimum of 416 Hrs of service to the Operator and this will offset some of the costs. 2. Maldives is a country where the first pilots and engineers have years to retire and applicants to the CAA have a desire to fly/work. CAA accepts that Operators do provide training opportunities to CAA. These are however very rare. For example within the last one year IASL has not provided CAA any training opportunities. We also note the CAA trained 10 staff of IAS on various courses, at its cost, during the last year.	N/A
9	21.A.185 (c)	IASL	As discussed during the meeting held at MCAA on 26n June, MCAA proposal is not practical. MCAA should not impose such requirements on the industry. We request that accommodating such requests from MCAA be left to the discretion of the industry and wherever possible, we will support MCAA.	Noted CAA believes it is practical since the 'pilot project' initiated with TMA is working very well for both the CAA and the company. CAA has also received feedback from EASA on this practice. According to the feedback some countries are engaged in similar practice and they also consider it to be a practical solution.	N/A

10	21.A.431 B	SARI	<p>SARI WG proposed to keep EC 1702/2003 as the basis of SARI Part 21 and hence MCAR-21 rather than EC 748/2012. This is because some of the changes in EC 748/2012 are based on years of design and production activity within the EU region and the resulting confidence in the system. On the other hand states like Maldives do not have design or manufacturing experience and thus it would be better to take a stepped approach.</p>	<p>Accepted Changes such as standard changes/repairs introduced in EC 748/2012 have been removed from MCAR-21</p>	<p>MCAR-21.A.90A - No Changes MCAR-21.A.90B - Removed AMC 21.303(c) - No Changes MCAR-21.A.307 - No Changes MCAR-21.A.431A(b) - Removed MCAR-21.A.431B - Removed Flowchart 3 to GM Subpart P - No Changes MCAR-21.A.711 - No Changes MCAR-21.A.729(b) - Reserved Appendix C Permit to Fly (CAA Form 21) - Changed to "Application for a Permit to Fly (CAA Form 21).</p>
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