EASA Comments on FAA EAPAS NPRM and Related AC's

Comment Number	FAR NPRM Paragraph	EASA Equivalent NPA CS Paragraph	EASA Comment
1	FAR Part 1	CS-Definitions	No comment
2	25.1	25.1	No comment, however EASA intend to use a different approach
3	25.2	n/a	No comment, however EASA intend to use a different approach
4	25.611	25.611	No comment from a technical point of view but the EASA NPA will reference 25.1725 as opposed to 25.1719 – see comment number 17
5	25.855	25.855	No comment and EASA support this change
6	25.869	25.869	No comment and EASA support this change
7	25.899	25.899	No comment and EASA support this change as it already exists in CS 25
8	25.1203(h)	25.1203(h)	This subparagraph should reference §25.1737
9	25.1301	25.1301	No comment and EASA support this change
10	25.1309	25.1309	No comment and EASA support this change
11	25.1310	25.1310	No comment and EASA support this change as it already exists in CS 25
12	25.1353	25.1353	No comment
13	25.1357	25.1357	No comment and EASA support this change
14	25.1360	25.1360	No comment and EASA support this change as it already exists in CS 25
15	25.1362	25.1362	No comment and EASA support this change as it already exists in CS 25
16	25.1365	25.1365	No comment as it already exists in CS 25, however we note that FAA have chosen to deviate from the ATSRAC Task 6 Working Group Report recommended wording for this paragraph

17	**Subpart H**	**Subpart H**	**General Comment on Subpart H paragraph numbering – EASA believe that the numbering should be changed per the attached table. The change will:** • **Rationalise the changes brought about by the "collector paragraph".** • **Move the "collector paragraph" to a more logical place which is at the beginning of subpart H** • **Provide Subpart H contents in a logical flow**
18	**25.1701**	**25.1701**	**No comment and EASA support this change**
19	**25.1703**	**25.1703**	**ATSRAC Task 6 Working Group Report recommended a paragraph (e). EASA believe that this paragraph should be included and it will appear in the EASA NPA**
20	**25.1705**	**25.1709**	**No comment and EASA support this change**
21	**25.1707**	**N/A**	**See comment number 17**
22	**25.1709**	**25.1707**	**(i) The NPRM uses the wording "any EWIS component failure…." In several places of this paragraph. It is believed this implies that an exhaustive list is to be produced which goes beyond the intent of this rule. The EASA NPA will use the wording "an EWIS component failure…" It is recommended that the NPRM changes to this phraseology.** **(ii) paragraph (k) uses the wording "..as a result of the assessment required by…" EASA believes this wording to be redundant and the wording should be ".. as required by CS 25.1709.." The EASA NPA will utilise the latter wording.** **(iii) paragraph (a) limits the applicability of 25.1309 to subparagraphs (b)1 and (b)2. EASA believe that for administrative purposes this should just reference 25.1309.**
23	**25.1711**	**25.1711**	**(i) There is a typo – two commas at the end of subparagraph (b).** **(ii) paragraph (b) uses the wording "..as a result of the assessment required by…" EASA believes this wording to be redundant and the wording should be ".. as required by CS 25.1709.." The EASA**

			NPA will utilise the latter wording
24	**25.1713**	**25.1713**	**Paragraph (a) should also reference 25.863. This will appear in the EASA NPA**
25	**25.1715**	**N/A**	**See comment number 17**
26	**25.1717**	**25.1715**	**No comment and EASA support this change**
27	**25.1719**	**25.1705**	**For consistency the collector paragraph should also reference:** • **25.854** • **25.858** • **25.1203** • **25.1303(b)** • **25.1331(a)2** **See also comments number 29, 35 and 36**
28	**25.1721**	**25.1717**	**No comment and EASA support this change**
29	**25.1723**	**n/a**	**This paragraph should be deleted and the references to 25.1303(b) and 25.1331(a)2 should moved to the collector paragraph**
30	**25.1725**	**25.1719**	**No comment, however it is noted that the wording is slightly different from that recommended by ATSRAC Task Group 6 (WSHWG). The EASA NPA will use the recommended wording.**
31	**25.1727**	**25.1721**	**No comment and EASA support this change**
32	**25.1729**	**25.1723**	**No comment, however it is noted that the wording is slightly different from that recommended by ATSRAC Task Group 6 (WSHWG). The EASA NPA will use the recommended wording.**
33	**25.1731**	**25.1725**	**No comment and EASA support this change**
34	**25.1733**	**25.1727**	**No comment and EASA support this change**
35	**25.1735**	**N/A**	**By adding the reference 25.854 and 25.858 to the collector paragraph would address the intent of this paragraph and there it can be deleted. This will be the position with the EASA NPA**
36	**25.1737**	**25.1731**	**Subparagraph (c) should be deleted and reference made to 25.1203 in the collector paragraph**
37	**25.1739**	**25.1729**	**No comment, however it is noted that FAA call for specific approval whereas EASA does not.**

38	**Subpart I**	**N/A**	**General Comment: EASA does not support the concept of using Part-25 as a vehicle to impart this kind of retroactive regulation. It would not be possible in the EASA regulatory regime to utilise CS 25 in the same manner. EASA intends to amend its Part 21 to address this retroactive regulation.**
39	**Appendix H25.1**	**Appendix H25.1**	**No comment and EASA support this change with the exception of using the concept of using subpart I as stated in comment number 38**
40	**Appendix H25.4**	**Appendix H25.4**	**No comment and EASA support this change**
41	**Appendix H25.5**	**Appendix H25.5**	**No comment and EASA support this change, however the majority of the wording will appear as AMC material in EASA NPA**
42	**25.1805**	**N/A**	**The applicability should also include STCs that significantly change the attributes of EWIS. This will be the position in the EASA NPA. See also comment number 38**

EASA Proposed New Subpart H Numbering System

25.1701 Definition
25.1703 Function and Installation: EWIS
25.1705 Systems and Functions: EWIS
25.1707 System Separation: EWIS
25.1709 System Safety: EWIS
25.1711 Component Identification: EWIS
25.1713 Fire Protection: EWIS
25.1715 Electrical Bonding and Protection against Static Electricity: EWIS
25.1717 Circuit Protective Devices: EWIS
25.1719 Accessibility Provisions: EWIS
25.1721 Protection of EWIS
25.1723 Flammable Fluid Protection: EWIS
25.1725 Powerplants: EWIS
25.1727 Flammable fluid shutoff means: EWIS
25.1729 Instructions for Continued Airworthiness - EWIS
25.1731 Powerplant and APU fire detector system: EWIS

Comments on the FAA NPRM related AC's

EWIS Training AC 120-YY

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Target group 1 EASA should be: Part 66 Cat B1 and Cat B2 personnel (licensed technician avionic) and avionic skilled workers The way it is written in the draft it can look like B2 personnel is the same as an avionic skilled worker
Target group 2 EASA should be: Part 66 Cat B1 and Cat B2 licensed personnel
Target group 4 EASA should read:
Part 66 Cat A (licensed technician – minor maintenance and simple repair) or B1 (licensed technician – excluded avionics)
Alternatively FAA could consider removing any references to EASA personnel in the AC. The FAA AC is intended to provide guidance within the FAA system and there will be an equivalent EASA AMC for the EASA system.

- Appendices A, B and C

EASA recommend that FAA revert to the wording as recommended in the ATSRAC task group 8 final report as noted in the table below. These words have specific meaning to training organisations as to how to undertake the necessary levels of training to make sure that the required skill sets are achieved

Differences in bold should be considered.
You will notice that there are other small differences in the wording, but basically the same meaning.

	Training matrix HWG 8 final report:	Training matrix FAA training AC:
A	**Know or** demonstrate the safe handling of airplane electrical systems, Line Replaceable Units, tooling, troubleshooting procedures and electrical measurement.	Demonstrate safe handling of airplane electrical systems, line replaceable units (LRUs), tooling, troubleshooting procedures, and electrical measurement.
B	**Know or demonstrate** the construction and navigation of the applicable airplane wiring system overhaul or wiring practices manual	**Understand** how the applicable airplane wiring system overhaul or wiring practices manual is organized **and demonstrate** navigation through the documents to find information.
C	Know the different types of inspections, human factors in inspections, zonal areas and typical damages	Know the different types of inspections, zonal areas and typical damages, and how human factors affect inspections.

D	Know the contamination sources, materials, cleaning and protection procedures	Know the contaminants, contamination sources, and cleaning and protection procedures.
E	**Know or** demonstrate the correct identification of different wire types, their inspection criteria, and damage tolerance, repair and preventative maintenance procedures	Demonstrate correct identification of different wire types, their inspection criteria and damage tolerance, and repair and preventative maintenance procedures.
F	Know **or demonstrate** the procedures to identify, inspect and find the correct repair for typical types of connective devices found on the **applicable** airplane.	Know the procedures to identify, inspect, and find the correct repair for typical types of connectors found on the **technician's** airplane.
G	Demonstrate the procedures for replacement of all parts of typical types of connective devices found on the **applicable** airplane.	Demonstrate replacement procedures for all parts of typical types of connectors found on the **technician's** airplane.

- Appendix C page 9 and 11

The different types of inspection contain SDI (Special detailed inspection). This is a term that no longer exists in current maintenance programmes. There is no definition for this on page 27 and it is not defined in the AC 120-XX. (It comes from Task 5 final report but left out in the Task 8 final report)

- **EZAP AC 120-XX**

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Definition for swarf is different from the AC 120-YY and also the ATSRAC HWG 8 final report and the EASA NPA. The correct version is contained within the FAA AC 120-YY
The definition should be consistent across all AC's.