

Mérignac, 30th, 2009

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**SUBJECT : Dassault Aviation comments on EASA NPA 2009-05: "Appendix 1
Aircraft type ratings for Part-66 aircraft maintenance licence"**

Dear Sir,

You will find in Attachment to this letter the Dassault Aviation comments on EASA NPA 2009-05 published last May 13th, 2009.

NPA 2009-05 proposes to amend Appendix 1 to Annex IV of Decision No 2003/19/RM to Commission Regulation (EC) No 2042/2003 Annex III (Part-66).

Appendix 1 includes the list of Aircraft type ratings for aircraft maintenance licenses.

We thank you to take into account these comments in the Decision adopting this NPA.

We remain at your disposal should you need further explanations.

Best regards.

A. PICARD

Attachment: Dassault Aviation comments on NPA 2009-05

1. As a general remark, EASA has to think about a quick mean to update this AMC Part-66. The update should be as quick as a new model and/or new commercial designation is put into service. NPA process is too long, and this could put burden onto operators (maintenance) otherwise. For information, on the pilot type rating side, European authorities decided to move the list from JAR-FCL1 onto a JAA JIP which can be updated very quickly to reflect a new model or variant as soon as the Authority (JOEB) recognizes it.
2. In NPA2009-05, the column AEROPLANES is divided into two columns MODEL and NAME. According to paragraph 10 on page 4 of the NPA2009-05, column MODEL should reflect the aircraft model as it appears in the EASA or FAA TCDS, whereas the column NAME should reflect the aircraft commercial designation when available.

As a result, for DASSAULT AVIATION aeroplanes, the two columns MODEL and NAME have to be swapped. Furthermore, DASSAULT AVIATION proposes to rename the column NAME by COMMERCIAL DESIGNATION to make it clearer.

3. Paragraph 10 B on page 5 of the NPA2009-05 says that one proposed modification is to simplify complicated designation (for example, "Dassault Falcon 7X" becomes "Falcon 7X"). It has been done for DASSAULT AVIATION aeroplanes, but not for some other OEMs. EASA should check the consistency of this decision for all OEMs.
4. DASSAULT AVIATION proposes to modify the list of type ratings, as shown in the chart below. The substantiation is coming from Falcon TCDS - see associated paragraph below.

1 TC Holder	2 Aeroplanes		3 Type rating endorsement
	Model	Commercial Designation	
DASSAULT AVIATION	Falcon 10		Falcon 10 (Honeywell TFE731)
	Fan Jet Falcon	(Basic) Fan Jet Falcon	Falcon 20 (GE CF700)
	Fan Jet Falcon Series C		
	Fan Jet Falcon Series D		
	Fan Jet Falcon Series E		
	Fan Jet Falcon Series F		
	Mystère Falcon 20-C5		Falcon 20-5 (Honeywell TFE731)
	Mystère Falcon 20-D5		
	Mystère Falcon 20-E5		
	Mystère Falcon 20-F5		
	Fan Jet Falcon Series G		Falcon 200 (Honeywell ATF 3-6)
	Mystère Falcon 200		
	Mystère-Falcon 20GF		
	Mystère-Falcon 50		Falcon 50 (Honeywell TFE731)
		F50EX	Falcon 50EX (Honeywell TFE731)
	Mystère-Falcon 900		Falcon 900 (Honeywell TFE731)
		F900B	
		F900C	Falcon 900C (Honeywell TFE731)
	Falcon 900EX		Falcon 900EX (Honeywell TFE731)
		F900EX EASy	Falcon 900EX EASy (Honeywell TFE731)
		F900DX	
	Falcon 2000		Falcon 2000 (CFE 738)
	Falcon 2000EX		Falcon 2000EX (PWC PW308C)
F2000EX EASy		Falcon 2000EX EASy (PWC PW308C)	
F2000DX			
F2000LX			
Falcon 7X		Falcon 7X (PWC PW307A)	

1. TCDS EASA.A.155 for Model Falcon 7X

- 1.1 Falcon 7X has PWC PW307A turbofan engines and Honeywell EPIC avionics (EASy). It is a model by itself, knowing that Falcon 7X by itself has no commercial designation.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Falcon 7X		Falcon 7X (PWC PW307A)

2. TCDS EASA.A.008 for Models Falcon 2000 and Falcon 2000EX

2.1 Falcon 2000 has CFE738-1-1B turbofan engines and Collins Proline IV avionics. It is a model by itself, knowing that Falcon 2000 by itself has no commercial designation. CFE738-1-1B can be abbreviated by CFE738 for the purpose of AML in this Part66.

2.2 Falcon 2000EX has PWC PW308C turbofan engines. It is a model with three different commercial designations, knowing that Falcon 2000EX by itself has no commercial designation. Note: Falcon 2000EX is a Falcon 2000 with engines change (PWC PW308C) and increase of fuel capacity - application of M1802 + M1803 + M1804 + M1805 + M1820 + M1838 + M2233 (+ M1826 starting serial number 2).

2.2.1 Falcon 2000EX EASy: basically, Falcon 2000EX EASy is a Falcon 2000EX with avionics change (Honeywell EPIC (EASy)).

Falcon 2000EX EASy is not a new model designation. This is only a commercial designation of a Falcon 2000EX, on which major modifications (M1691 + M1745 + M1504) have been applied.

2.2.2 Falcon 2000DX: basically Falcon 2000DX is a Falcon 2000EX EASy with a reduction in fuel capacity.

Falcon 2000DX is not a new model designation. This is only a commercial designation of a Falcon 2000EX EASy, on which major modification M3000 have been applied.

2.2.3 Falcon 2000LX: basically Falcon 2000LX is a Falcon 2000EX EASy with the addition on winglets.

Falcon 2000LX is not a new model designation. This is only a commercial designation of a Falcon 2000EX EASy, on which major modification M2846 have been applied.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Falcon 2000		Falcon 2000 (CFE 738)
Falcon 2000EX		Falcon 2000EX (PWC PW308C)
	F2000EX EASy	Falcon 2000EX EASy (PWC PW308C)
	F2000DX	
F2000LX		

3. TCDS EASA.A.062 for Models Mystère-Falcon 50, Mystère-Falcon 900, and Falcon 900EX

3.1 Mystère-Falcon 50 has Honeywell TFE731-3-1C turbofan engines (can be abbreviated by Honeywell TFE731 for the purpose of AML in Part66). It is a model with one commercial designation, knowing that Mystère-Falcon 50 by itself has no commercial designation:

3.1.1 Falcon 50EX: basically, Falcon 50EX is a Mystère-Falcon 50 with engines change (Honeywell TFE731-40-1C, which can be abbreviated by Honeywell TFE731 for the purpose of AML in Part66) and avionics change (Collins Proline IV).

Falcon 50EX is not a new model designation. This is only a commercial designation of Mystère-Falcon 50, on which majors modifications (M1810 + M1939 + M1890 + M1940 + M2159 + M1200) have been applied.

3.2 Mystère-Falcon 900 has AlliedSignal/Honeywell TFE731-5AR-1C turbofan engines (can be abbreviated by Honeywell TFE731 for the purpose of AML in Part66). It is a model and has two different commercial designations, knowing that Mystère-Falcon 900 by itself has no commercial designation:

3.2.1 Falcon 900B: basically, Falcon 900B is a Mystère-Falcon 900 with engine change (AlliedSignal/Honeywell TFE731-5BR-1C, which can be abbreviated by Honeywell TFE731 for the purpose of AML in Part66).

Falcon 900B is not a new model designation. This is only a commercial designation of Mystère-Falcon 900, on which modifications (M1200 + M1548) have been applied.

3.2.2 Falcon 900C: basically, Falcon 900C is a Mystère-Falcon 900 with avionics change (Honeywell Primus 2000).

Falcon 900C is not a new model designation. This is only a commercial designation of Mystère-Falcon 900, on which modification (M1975 or M2695) have been applied. Falcon 900C has AlliedSignal/Honeywell TFE731-5BR-1C turbofan engines.

3.3 Falcon 900EX has AlliedSignal/Honeywell TFE731-60 turbofan engines (can be abbreviated by Honeywell TFE731 for the purpose of AML in Part66) and Honeywell Primus 2000 avionics. It is a model and has two different commercial designations,

knowing that Falcon 900EX by itself has no commercial designation. Note: Falcon 900EX is a Mystère-Falcon 900 on which modification M3000 have been applied.

- 3.3.1 Falcon 900EX EASy: basically, Falcon 900EX EASy is a Falcon 900EX with avionics change (Honeywell EPIC (EASy)).

Falcon 900EX EASy is not a new model designation. This is only a commercial designation of Falcon 900EX, on which modifications have been applied (Step 1: M3083 + M2862 + M2861 + M2963 + M2823).

- 3.3.2 Falcon 900DX: basically, Falcon 900DX is a Falcon 900EX EASy with a reduction in fuel capacity.

Falcon 900DX is not a new model designation. This is only a commercial designation of a Falcon 900EX, on which major modifications M4000 + M3876 + M5046 + M3755 + M2823 have been applied.

Note concerning the engines Honeywell TFE731-xxx: difference between -5AR-1C and -5BR-1C is a thrust rating difference, but they remain the same engines. -3-1C and -40-1C are different engines.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Mystère-Falcon 50		Falcon 50 (Honeywell TFE731)
	F50EX	Falcon 50EX (Honeywell TFE731)
Mystère-Falcon 900		Falcon 900 (Honeywell TFE731)
	F900B	
	F900C	Falcon 900C (Honeywell TFE731)
Falcon 900EX		Falcon 900EX (Honeywell TFE731)
	F900EX EASy	Falcon 900EX EASy (Honeywell TFE731)
	F900DX	

4. TCDS DGAC-F n°103 for Models Fan Jet Falcon, Fan Jet Falcon Series C, Fan Jet Falcon Series D, Fan Jet Falcon Series E, and Fan Jet Falcon Series F

Note: TCDS DGAC-F n°103, 103bis, and 103ter will be merged into a single EASA TCDS.

- 4.1 Fan Jet Falcon has General Electric GE CF700-2C turbofan engines. It is also called "Fan Jet Falcon (Basic)". It is a model by itself.
- 4.2 Fan Jet Falcon Series C has General Electric GE CF700-2C turbofan engines. Fan Jet Falcon Series C is a Fan Jet Falcon (Basic) on which modification AMD M1547 has been applied (increase fuel capacity, etc... see TCDS). It is a model by itself.
- 4.3 Fan Jet Falcon Series D has General Electric GE CF700-2D turbofan engines. Fan Jet Falcon Series D is a Fan Jet Falcon (Basic) on which modification AMD M1200 has been applied (change in engines, increase fuel capacity, etc... see TCDS). It is a model by itself.
- 4.4 Fan Jet Falcon Series E has General Electric GE CF700-2D-2 turbofan engines. Fan Jet Falcon Series E is a Fan Jet Falcon Series D on which modification AMD M1487 has been applied (change in engines, etc... see TCDS). It is a model by itself.
- 4.5 Fan Jet Falcon Series F has General Electric GE CF700-2D-2 turbofan engines. Fan Jet Falcon Series F is a Fan Jet Falcon Series D on which modification AMD M1400 has been applied (change in engines, new slats, increase fuel capacity, etc... see TCDS). It is a model by itself.

Note concerning the engines General Electric GE CF700-xx: -2C, -2D, -2D-2 can be considered in the same group for the purpose of AML in Part66, the difference being a thrust rating difference. Therefore, they can be abbreviated GE CF700 for the purpose of AML in Part66.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Fan Jet Falcon	Fan Jet Falcon (Basic)	Falcon 20 (GE CF700)
Fan Jet Falcon Series C		
Fan Jet Falcon Series D		
Fan Jet Falcon Series E		
Fan Jet Falcon Series F		

5. TCDS DGAC-F n°103bis for Models Fan Jet Falcon Series G, Mystère-Falcon 200, and Mystère-Falcon 20GF

Note: TCDS DGAC-F n°103, 103bis, and 103ter will be merged into a single EASA TCDS.

- 5.1 Fan Jet Falcon Series G has Garrett ATF3-6-2C P/N 3001400-1 turbofan engines. It is a Fan Jet Falcon Series F with change in engines, etc... see TCDS. It is a model by itself.
- 5.2 Mystère-Falcon 200 has Garrett ATF3-6A-4C P/N 3003100-1 turbofan engines. It is a Fan Jet Falcon Series F with change in engines, etc... see TCDS. It is a model by itself.
- 5.3 Mystère-Falcon 20GF has Garrett ATF3-6A-4C P/N 3003100-1 turbofan engines. It is a Fan Jet Falcon Series F with change in engines, etc... see TCDS. It is a model by itself.

Note concerning the engines Garrett ATF3-6: ATF3-6A-4C P/N 3003100-1 has a new fan compared to ATF3-6-2C P/N 3001400-1 but the technology is the same. The thrust rating is different. Both engines can be considered in the same group for the purpose of AML in Part66, and can be abbreviated Honeywell ATF3-6 for the purpose of AML in Part66.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Fan Jet Falcon Series G		Falcon 200 (Honeywell ATF3-6)
Mystère-Falcon 200		
Mystère-Falcon 20GF		

6. TCDS DGAC-F n°103ter for Models Mystère-Falcon 20-C5, Mystère-Falcon 20-D5, Mystère-Falcon 20-E5, and Mystère-Falcon 20-F5

Note: TCDS DGAC-F n°103, 103bis, and 103ter will be merged into a single EASA TCDS.

- 6.1 Mystère-Falcon 20-C5 has Garrett TFE731-5AR-2C turbofan engines if Service Bulletin BS735 is not installed, and has Garrett TFE731-5BR-2C turbofan engines if Service Bulletin BS735 is installed. It is a Fan Jet Falcon (Basic) with application of Service Bulletin AMD-BA FJF731. It is a model by itself.
- 6.2 Mystère-Falcon 20-D5 has Garrett TFE731-5AR-2C turbofan engines if Service Bulletin BS735 is not installed, and has Garrett TFE731-5BR-2C turbofan engines if Service Bulletin BS735 is installed. It is a Fan Jet Falcon Series D with application of Service Bulletin AMD-BA FJF731. It is a model by itself.
- 6.3 Mystère-Falcon 20-E5 has Garrett TFE731-5AR-2C turbofan engines if Service Bulletin BS735 is not installed, and has Garrett TFE731-5BR-2C turbofan engines if Service Bulletin BS735 is installed. It is a Fan Jet Falcon Series E with application of Service Bulletin AMD-BA FJF731. It is a model by itself.
- 6.4 Mystère-Falcon 20-F5 has Garrett TFE731-5AR-2C turbofan engines if Service Bulletin BS735 is not installed, and has Garrett TFE731-5BR-2C turbofan engines if Service Bulletin BS735 is installed. It is a Fan Jet Falcon Series F with application of Service Bulletin AMD-BA FJF731. It is a model by itself.

Note concerning the engines Garrett TFE731-5AR-2C and TFE731-5BR-2C: both engines can be considered in the same group for the purpose of AML in Part66, the difference being a thrust rating difference. Therefore, they can be abbreviated Honeywell TFE731 for the purpose of AML in Part66.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Mystère-Falcon 20-C5		Falcon 20-5 (Honeywell TFE731)
Mystère-Falcon 20-D5		
Mystère-Falcon 20-E5		
Mystère-Falcon 20-F5		

7. TCDS DGAC-F n°142 for Model Falcon 10

- 7.1 Falcon 10 has Garrett TFE731-2-1C turbofan engines (which can be abbreviated Honeywell TFE731 for the purpose of AML in Part66). It is a model by itself, knowing that Falcon 10 by itself has no commercial designation.

Falcon 100 is a Falcon 10 on which DASSAULT AVIATION Service Bulletins and modifications have been applied, to install EFIS85, 4th window on the right hand part of the fuselage, etc... however, Falcon 100 is not referenced as a commercial designation in the Falcon 10 TCDS, therefore, the row Falcon 100 is proposed to be deleted.

2 Aeroplanes		3 Type rating endorsement
Model	Commercial Designation	
Falcon 10		Falcon 10 (Honeywell TFE731)

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