Panasonic Avionics Corporation

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Eric Sivel,
Continuing Airworthiness,
European Aviation Safety Agency,
Postfach 101253,
D-50452,
Koeln, Germany.

03 November 2006.

Dear Mr.Sivel.

Panasonic Avionics Corporation is a US In-Flight-Entertainment (IFE) vendor with many global Aviation Approvals including a European EASA Part 145- C3, C6 & Limited A1 Approval Rating (UK.145.00297) to cover European and Australasian operations. (The A1 Line Maintenance Approval being granted in 1998 and limited to maintenance and release to service of our IFE installed equipment.)

When JAR-66 became effective the UK-CAA allowed Panasonic Avionics Corporation to continue operating without the requirement to link Engine Type to the Airframe Types that our JAR-66 B2 technicians were making release to service upon.

This was based on the UK CAA's interpretation of the rule at that time.

Justification for this was based on the engine type has no bearing whatsoever on our maintenance activity, training requirements, procedures or release to service of our IFE components and systems.

During April 2005, Panasonic Avionics Corporation received notification from the UK-CAA that this decision was being suspended pending clarification from EASA.

Panasonic Avionics Corporation has been advised by the UK CAA to seek clarification of the release to service certification requirement from EASA.

To require our EASA Part 66 B2 Technicians to hold all Engine/Airframe type combinations for the release to service of our IFE components will increase costs significantly and adds no value to the airworthiness of our maintenance and release to service activity.

Panasonic Avionics Corporation therefore suggest meeting with you to resolve the matter at the earliest possible opportunity.

Yours sincerely,

Stefan Suri,

Manager, International QA,

Panasonic Avionics Corporation.

Cc:-				
UK Civil Aviation Authority:-	J. Holding	S. Roberts	N. Williams	
European Aviation Safety Agency:-	J. Hall			
Panasonic Avionics Corporation:-	R. Dick	L. Allman	T. Lazaro	G. Slinn