



**Karl Specht** • Continuing Airworthiness Organisations Manager • A & S Directorate

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Cologne, 23 Januar 2012  
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**Aeronautical Repair Station  
Association, ARSA  
Mr. Fabian  
121 North Henry Street  
Alexandria, VA 22314-2903**

**Subject: JMCB meeting 15-17 November 2011 in Cologne**  
**Reference: Your letter dated, 10 November 2011**

Dear Mr. Fabian,

Thank you for your letter, which provided valuable input to the participants of the last JMCB meeting which took place 15-17 November 2011 in Cologne.

We have discussed the three topics you have highlighted in your letter in great detail and can provide you with the following answers:

1. **EASA Special Condition: Human Factors (HF) training**  
This issue has always been in our focus and we tried from both sides, FAA and EASA, to harmonize the regulation as much as possible. It would be most beneficial from a safety and also from an economic standpoint to eliminate such a special condition. However, unfortunately all proposed changes to the FARs have not been accepted yet. Therefore we still have a situation where HF training is part of the rule in EASA Part 145 (mandatory), whereas it is only guidance in the FAA regulatory system (recommended).  
Furthermore, the topics listed in section B of the MAG differ from those previously identified in the MIP-G, because the aforementioned regulation has changed in 2010. The new lists of topics contained in Section B of the MAG mirror current EASA requirements applicable to all Part 145 approved organisations.
2. **AD procedures in Section B paragraph 9**  
We cannot share your position that those provisions are confusing. In fact they clearly explain what is expected from the maintenance organisation:
  - ensure that all applicable EASA ADs are available
  - procedure to manage and distribute those ADs within the organisation
  - coordination and interface with the customer/work orderThis is basically the same requirement as already in place for FAA ADs. As long as there are two different regulatory systems with two different AD systems both requirements have to be met for organisations holding dual certification.
3. **Part tagging requirements**  
This item has been clarified already with EASA letter reference RHA/kgu/R(4)2011(D)53249.

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Both systems are different in respect to part tagging requirements. The EASA Form 1 is of utmost importance for the European aviation system due to its structure of 31 different partners (27 Member States plus Switzerland, Iceland, Norway and Lichtenstein). Therefore this requirement is part of the rule and mandatory for all organisations in aforementioned regulatory system. As the FARs do not mandate such a strict format for part tagging, there was the need for a special condition. This special condition is putting the same requirement on EASA approved US organisation as it is in place for all other EASA approved organisation in the Member States and in third countries.

Let me reassure you that we constantly look into those special conditions on both sides of the Atlantic to further harmonize our two systems. Your input is therefore of great value to us and we appreciate your effort in that matter.

This letter and its content has been coordinated with Steve Douglas, FAA, Division Manager AFS 300.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'K. Specht', with a stylized flourish at the end.

Karl Specht

Cc: Steve Douglas, FAA