



COMMENT RESPONSE DOCUMENT NPA FOR DCP 2024-033

INTRODUCTION

1. **General.** DASA takes this opportunity to thank those that have provided valuable Aviation Safety Community perspective and input to this DASR change. This Comment Response Document (CRD) outlines DASA's agreed policy and intended regulation changes and finalises the public consultation process in respect of this NPA. Any member of the public having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA.
2. **Background.** On 19 Nov 24, DASA released Notice of Proposed Amendment (NPA) DASR Change Proposal (DCP) 2024-033 - DASR Part M AMC and GM proposed amendments for comment. The period for public comment on the proposals contained in this NPA closed on 13 Dec 24.

ANALYSIS OF COMMENTS

General

3. DASA received responses to the NPA from six stakeholders. A summary of the replies raised along with DASA's responses are highlighted below. Content relocated to DASPMAN Vol 3 will be updated in DASPMAN Vol 3 simultaneously with relevant deletions from DASR (DASPMAN Vol 2).
4. All responses to the NPA stated 'The proposal is acceptable' with the following caveats:
 5. a. 'without change' – provided by two respondents.
 6. b. 'but would be improved if the following changes were made' – provided by four respondents, and further discussed in comments 1 to 5 below.
7. Some comments were general in nature covering editorial and typographical errors. Several comments regarding AMC M.A.710(a)(3) were related to general paragraph numbering, and formatting. The majority of these comments were agreed to and will be incorporated in the final DASR release. Comments 6 and 7 are the results of further internal DASA review post the NPA closure date.

Comment 1

8. **AMC M.A.706(d).** EngExec is not a qualification that is granted automatically, it is by invitation from Engineers Australia after having demonstrated 15 years of experience and be in a senior leadership/management role. DASA to evaluate whether the CAM is to be a senior O6 level only, as junior O6's will not have met the criteria. Suggest use of "eligible for" or "equivalent to".
9. **DASA Response.** DASA agrees with the suggested change.
10. **Disposition.** Relevant AMC moved from AMC M.A.706(d) to AMC M.A.706 and amended to include "eligible for" or "equivalent to".

Comment 2

11. **GM M.A.704(c).** Within GM M.A.704(c), the linkage to M.A.713(a) is useful so disagree that it is of no value. Recommend maintaining AMC or moving to Vol 3 of the DASPMAN.
12. **DASA Response.** Although the indirect approval procedure is approved by the regulator, DASA agrees with the comment.
13. **Disposition.** Retain GM M.A.704(c).



Comment 3

14. **AMC M.A.710(a)(3).** [Deleted paragraphs 1, 2 & 5] repeat the intent of the regulation but are useful educational material – Recommend text moved to DASPMAN Vol 3
15. **DASA Response.** Partially agree. One paragraph proposed for deletion will be retained in the AMC. Deleted paragraphs were overly prescriptive and would have detracted from the new DASPMAN Vol 3 chapter on Airworthiness Reviews.
16. **Disposition.** Para 5 of existing AMC has been retained while para 1 and 2 will be deleted.

Comment 4

17. **AMC M.A.710(a)(10).** “Any variation of configuration from MTC should be supported by a DADR 21 approval” should remain as AMC, as this is referring to any MPTFs that have been approved to allow the aircraft to operate when it does not meet its TCB, but is capable of safe flight under specified conditions.
18. **DASA Response.** Discussed with comment originator; aircraft with an active MPTF & CC will be addressed in a separate DCP to M.A.710 & M.A.901 in 2025. Given this pending DCP, it was agreed with the comment originator that retaining this content in the AMC is not needed.
19. **Disposition.** The entire AMC to be relocated to DASPMAN Vol 3 as per NPA.

Comment 5

20. **GM M.A.710(e).** Noting that the Regulation clause details two options to issue a MARC – directly or by recommendation – the first sentence should remain as GM as clarification of privilege status. No issues with moving the remainder of the GM to DASPMAN Vol 3.
21. **DASA Response.** Agree.
22. **Disposition.** First sentence remains as GM, remainder moved to DASPMAN Vol 3.

Comment 6

23. Although originally proposed for deletion in the NPA, after further internal DADR review, prompted by NPA feedback, it was decided to retain GM.A.712(b), GM M.A.712(e) and GM M.A.712(g) as they have applicability in the current environment and have no obvious location in DASPMAN Vol 3 at this time.

Comment 7

24. AMC M.A.710 (a)(9) was inadvertently left out of the NPA. This AMC will be relocated to the new DASPMAN Vol 3 chapter on Airworthiness Reviews, consistent with the intent of the NPA and the acceptance of similar relocations in the NPA responses.

AUTHORITY

25. The content of this Summary of Responses has been reviewed and is authorised.

GD LAMONT

LTCOL
Deputy Director Regulations, Licencing & Training
Defence Aviation Safety Authority
Tel: (07) 3903 6643

Annex:

- A. List of Respondents

LIST OF RESPONDENTS

1. HQAC A9
2. HQ AVNCOMD
3. HQ AFTG
4. HQ SRG
5. HQ ACG
6. HQ AMG