



COMMENT RESPONSE DOCUMENT NPA FOR DCP 2024/035

INTRODUCTION

- General.** Readers should note that 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. Only under extreme or unusual circumstances will DASA consider views or arguments opposing the views expressed in the CRD. Any member of the public having views or arguments to support an appeal against the decisions documented in this CRD may petition DASA to consider such an appeal.
- Background.** On 25 Nov 24, DASA released NPA to DCP 2024-035: Amendments to DASR 21 for Incorporation of Operational Suitability Data (OSD) for comment. The period for public comment on the proposals contained in this NPA closed on 20 Dec 24.

ANALYSIS OF COMMENTS

General

- DASA received five responses to NPA for DCP 2024-035 (refer Annex A). All responses to the NPA stated that the 'The proposal is acceptable', however, one indicated that changes were required.
- All comments received were assessed by DASA and a formal position was agreed, some proposed improvements were shared by DASA and corresponding changes have been made. The key feedback is discussed below, while a full list of the comments raised, along with DASA's responses, are included at Annex B. Many comments were general in nature covering diverse subjects such as: printability, editorial and typographical errors, incorrect cross references, paragraph numbering, administrative and procedural matters, and the perceived need for guidance material to support the regulations. These comments were addressed and responded to as a group.

Comment 1

- NPA Response Sheet - AFTG LSN 1:** Noting NPA 2024-035 GM 21.A.15(d), mark DASR 21.1(k)(i) to (iv) as 'Reserved' as follows:

Based on the OSD-Elements defined in DASR 21.1(k) any application for an MTC or MRTC should cover the following areas, also referred to as OSD-constituents, as applicable:

- (Reserved).*
- (Reserved).*
- (Reserved).*
- (Reserved).*
- The master minimum equipment list.*
- Other type-related operational suitability elements (where applicable).*

The explanation raised concerns about the scope and potential cross-over between OSD for pilot type rating training and Learning Management Packages (LMP) for pilot conversion courses.

- DASA Response.** The purpose of DASR 21.1(k) is to define what data OSD may consist of, while AMC 21.A.17B defines the OSD constituents that are to be included in an application for a



Military Type Certificate (MTC) or a Military Restricted Type Certificate (MRTC). The proposed implementation of OSD into DASR 21 requires an applicant for an MTC or MRTC to, at minimum, include a Master Minimum Equipment List (MMEL) in their application, while retaining the option for an applicant (through GM1, GM2 and AMC 21.A.15(d)) to also include the other elements/constituents in their application if they are available to the applicant.

7. OSD under DASR 21 requires the applicant to provide for DASA approval type specific technical data relating to operational suitability that is developed by the OEM or Military Type Certificate Holder (MTCH). This data is intended for use by the MAO in MAO processes and procedures. The applicant is required to make the data available in a manner acceptable to DASA, and maintain the data throughout the life of type. The intent is that subsequent activities, information or items which support operations with the aircraft (such as training content, simulators and so on) are based upon accurate data approved by the aircraft designer. At this time there is no DASR obligation on the MAOs to use the OSD. MAO processes and procedures (such as Learning Management Package [LMP] and pilot conversion courses) are not in the scope of being regulated under OSD in DASR 21.

8. **Disposition.** Not accepted.

Comment 2

9. **NPA Response Sheet - AFTG Review LSN 2:** If comment 1 is not implemented, noting NPA 2024-035 GM2 21.A.15(d), revise DASR 21.1(k)(i) dealing with type rating for pilots, as follows:

(i) the original type certificate holder's minimum Learning Management Package of pilot type rating training, including determination of type rating

10. The explanation echoed concerns raised in Comment 1 about the potential cross-over between OSD for pilot type rating training and the Learning Management Package (LMP) for pilot conversion courses. The respondent is recommending adjusting 21.1(k) wording to refer to "minimum LMP" instead of "minimum syllabus" for pilot type rating training and determination of type training.

11. **DASA Response.** Amending DASR 21.1(k)(i) as suggested would put LMPs within the scope of DASR 21 regulation (see Comment 1). DASA has no intent to regulate LMPs through DASR 21, the intent is to provide safety assurance of data OEMs or MTCHs provide to the regulated community (e.g. OEM course for pilot type rating training) that then informs MAO developed/required documentation, processes and procedures.

12. **Disposition.** Not accepted.

Comment 3

13. **NPA Response Sheet - AFTG Review LSN 3:** Add '... detailed in AMC 21.A.17B.' to end AMC 21.A.15(d). That is:

a. *Where Operational Suitability Data (OSD) is already available for the product, an application under Subpart B, D or E should be supplemented by an application for approval of OSD detailed in AMC 21.A.17B.*

14. The explanation was provided as:

a. Despite GM 21.A.15(d) and AMC 21.A.17B, AMC 21.A.15(d), as worded, requires the applicant to seek DASA to approve the Defence pilot type rating LMP through DASR 21.1(k)(i) for a change to the MTC.

15. **DASA Response.** AMC 21.A.15(d) provides a "should" statement that if OSD is available, it should be submitted as part of the OSD Certification Basis (CB) for approval, which is then reiterated in AMC 21.A.17B. OSD constituents other than the MMEL are not mandated under the proposed implementation and are therefore not required to be submitted for approval.

16. Agreed on incorporation of reference to 21.A.17B as the method in which the OSD is to be submitted; however, the implication that current wording of AMC 21.A.15(d) requires the applicant to seek DASA approval of an LMP is not supported as LMPs are not an OSD constituent (see DASA response to Comment 1).

17. **Disposition.** Noted.

Comment 4

18. **NPA Response Sheet - AFTG Review LSN 11:** Syllabus is an obsolete term in Australian training vernacular. An LMP consists of a curriculum (Section 2) and other sections. Hence DASR 21.1(k)(i) should read:

- a. *the minimum learning management package of pilot type rating training, including determination of type rating*

19. **DASA Response.** See response to Comment 1. Further, DIA-DASA prefers not refer to specific documents, processes or procedures developed by the regulated community and not within the scope of DASR 21. The reasoning for this is that any changes to those documents, processes or procedures requires a regulation change to remove from DASR 21. Additionally, the term 'syllabus' retains consistency with EMAR and EASA to provide clarity as to the intent of the term. DASA has no intent to regulate LMPs through DASR 21.

20. **Disposition.** Not accepted.

Comment 5

21. **NPA Response Sheet - AFTG Review LSN 12:** Depending on what DASA means by 'pilot type rating training', this may be over-reach in the Defence context:

- a. AFTG concurs with the OEM course for pilot type training if that is what is meant.
- b. AFTG does not agree that this is the MAO's aircraft type pilot conversion course, because that is the role of the Capability Manager and MAO to determine, governed under DASR Aircrew.10 and the Defence Learning Manual, and not of DASA (further, DASA does not have personnel qualified to do the verification of an LMP and thereby not appropriate for DASA to be the authority).

22. **DASA Response.** "a" is the correct interpretation. OSD is data that comes from the OEM or is generated by the MTCH/MDOA as part of the design process or future changes to the type certificate. The content and nature of the data itself is as defined in the relevant certification specification, depending on the regulatory framework from which the platform and data are acquired. The purpose of implementing OSD is to provide safety assurance of this data. LMPs are not in the scope of being regulated under OSD or DASR 21.

23. **Disposition.** Noted.

Comment 6

24. **OIC TC, DIA-DASA:** Adjust references to "ETOPS" to instead refer to "DLRO" to provide greater applicability to the ADF contexts.

25. **DASA Response.** Update incorporated accordingly.

26. **Disposition.** Accepted.

Comment 7

27. **OIC TCH O&E, DIA-DASA:** New MTCH obligation at DASR 21.62 and 21.A.120B pertaining to the availability of operational suitability data requires promulgation into DASRs as a MTCH obligation.

28. **DASA Response.** Update incorporated accordingly, included 21.A.62 as an obligation under 21.A.44 and 21.A.120B under 21.A.118A.

29. **Disposition.** Accepted.

AUTHORITY

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

DM GROSSE

EL2

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Annex:

- A. List of Respondents
- B. NPA for DCP 2024-035 – DASA Response to AFTG Feedback

NOTICE OF PROPOSED AMENDMENT – NPA 2024-035

LIST OF RESPONDENTS

1. AFTG
2. Boeing Design Australia
3. ASCISPO
4. OIC TC, DIA-DASA
5. OIC TCH O&E, DIA-DASA

NOTICE OF PROPOSED AMENDMENT – NPA 2024-035

DASA Response to AFTG Feedback

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
1	DASR 21.1(k)(i)	<p>Noting NPA 2024-035 GM 21.A.15(d):</p> <p><i>Based on the OSD-Elements defined in DASR 21.1(k) any application for an MTC or MRTC should cover the following areas, also referred to as OSD-constituents, as applicable:</i></p> <ol style="list-style-type: none"> 1. <i>(Reserved).</i> 2. <i>(Reserved).</i> 3. <i>(Reserved).</i> 4. <i>(Reserved).</i> 5. <i>The master minimum equipment list.</i> 6. <i>Other type-related operational suitability elements (where applicable).</i> <p>mark DASR 21.1(k)(i) to (iv) as 'Reserved'. See LSN 2 otherwise.</p>	<p>The current implementation within AMC 21.A.17B is noted; however, the following are concerns with the as written DASR 21.1(k)(i):</p> <ol style="list-style-type: none"> 1. Depending on what DASA means by 'pilot type rating training', the policy in DASR 21.1(k)(i) may be over-reach in the Defence context: <ol style="list-style-type: none"> a. AFTG concurs with the OEM course for pilot type training if that is what is meant b. AFTG does not agree that this is the aircraft type MAO's pilot conversion course, because that is the role of the Capability Manager and MAO to determine, not DASA (further, DASA does not have personnel qualified to do the verification of an aircraft type rating LMP and thereby not appropriate to require DASA to approve of an LMP). 2. NPA 2024-035 DASR 21.1(k)(i) wording applies to both the LMP proffered by the original TC holder related to the original type certificate, and to the Defence LMP for MTC. 3. The NPA 2024-035 DASR 21.1(k)(i) text linking the MAO's pilot type rating LMP to the MTC: <ol style="list-style-type: none"> a. conflicts with the authority, responsibilities and accountabilities of 	Not accepted	Addressed in the main body of the CRD at paragraphs 5 to 8.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
			<p>the:</p> <p>(1) MAO vide DASR Aircrew.10 (2) Defence training authorities under the <i>Defence Learning Manual</i>, including those of VCDF, and single-Service learning management authorities (ACAUST and FEG CDRs in Air Force)</p> <p>b. places DASA as the authority from which the MAOs must seek authorisation of the LMPs for:</p> <p>(1) pilot conversion, which is the LMP in scope of '... minimum [Learning Management Package] of pilot type rating training, including determination of type rating' [and possibly other aircrew conversion LMPs depending on the intent of NPA 2024-035 DASR 21.1(k)(iv)] (2) in the case of the PC-21, because pilot-initial trainees achieve PC-21 type rating only through the pilots course LMP, prima facie the pilot training LMP.</p> <p>4. Placing aircrew type rating Defence LMPs within the MTC serves no identifiable aviation safety purpose and prima facie merely adds unneeded governance to the established and functioning <i>Defence Learning Manual</i> policies and DASR Aircrew.10.</p>		

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
2	DASR 21.1(k)(i)	<p>If not LSN 1, noting NPA 2024-035 GM2 21.A.15(d):</p> <p><i>When the application for an MTC (including MRTC or MSTC) is based on a Type Certificate issued under a different legal framework (such as EASA), such a Type Certificate may contain OSD as approved data. The OSD available will be dependent of the class of the Aircraft in the following areas:</i></p> <ul style="list-style-type: none"> • <i>Minimum syllabus of pilot type rating training, including determination of type rating.</i> • <i>Definition of scope of the aircraft validation source data to support the objective qualification of simulator(s) associated to the pilot type rating training, or provisional data to support their interim qualification.</i> • <i>Minimum syllabus of maintenance certifying staff type rating training, including determination of type rating.</i> • <i>Determination type specific data for cabin crew training.</i> • <i>Other type-related operational suitability elements.</i> <p>...</p> <p>revise DASR 21.1(k)(i) dealing with type rating for pilots, as follows:</p> <p>(i) the original type certificate holder's minimum Learning Management</p>	<p>The current implementation within AMC 21.A.17B is noted; however, the following are concerns with the as written DASR 21.1(k)(i):</p> <ol style="list-style-type: none"> 1. Depending on what DASA means by 'pilot type rating training', the policy in DASR 21.1(k)(i) may be over-reach in the Defence context: <ol style="list-style-type: none"> a. AFTG concurs with the OEM course for pilot type training if that is what is meant b. AFTG does not agree that this is the aircraft type MAO's pilot conversion course, because that is the role of the Capability Manager and MAO to determine, not DASA (further, DASA does not have personnel qualified to do the verification of an aircraft type rating LMP and thereby not appropriate to require DASA to approve of an LMP). 2. NPA 2024-035 DASR 21.1(k)(i) wording applies to both the LMP proffered by the original TC holder related to the original type certificate, and to the Defence LMP for MTC. 3. The NPA 2024-035 DASR 21.1(k)(i) text linking the MAO's pilot type rating LMP to the MTC: <ol style="list-style-type: none"> a. conflicts with the authority, responsibilities and accountabilities of the: <ol style="list-style-type: none"> (1) MAO vide DASR Aircrew.10 (2) Defence training authorities under the <i>Defence Learning Manual</i>, 	Not accepted	Addressed in the main body of the CRD at paragraphs 9 to 12.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
		Package of pilot type rating training, including determination of type rating	<p>including those of VCDF, and single-Service learning management authorities (ACAUST and FEG CDRs in Air Force)</p> <p>b. places DASA as the authority from which the MAOs must seek authorisation of the LMPs for:</p> <p>(1) pilot conversion, which is the LMP in scope of ‘... minimum [Learning Management Package] of pilot type rating training, including determination of type rating’ [and possibly other aircrew conversion LMPs depending on the intent of NPA 2024-035 DASR 21.1(k)(iv)]</p> <p>(2) in the case of the PC-21, because pilot-initial trainees achieve PC-21 type rating only through the pilots course LMP, prima facie the pilot training LMP.</p> <p>4. Placing aircrew type rating Defence LMPs within the MTC serves no identifiable aviation safety purpose and prima facie merely adds unneeded governance to the established and functioning <i>Defence Learning Manual</i> policies and DASR Aircrew.10.</p>		

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
3	AMC 21.A.15(d)	<p>Add '... detailed in AMC 21.A.17B.' to end AMC 21.A.15(d). That is:</p> <p><i>Where Operational Suitability Data (OSD) is already available for the product, an application under Subpart B, D or E should be supplemented by an application for approval of OSD detailed in AMC 21.A.17B.</i></p>	<p>Despite GM 21.A.15(d) and AMC 21.A.17B, AMC 21.A.15(d), as worded, requires the applicant to seek DASA to approve the Defence pilot type rating LMP through DASR 21.1(k)(i) for a change to the MTC.</p>	Not accepted	<p>Addressed in the main body of the CRD at paragraphs 13 to 17.</p>
Many	Many	<p>Replace all uses of a forward slash in place of a conjunction (and, or, en dash, but, however, etc) with the correct conjunction. There are several limited occasions to use a forward slash in English and, but for directly replicating usages in references (eg ED Decision 2017/024/R is correct usage), none of those occasions for using a forward slash exist in DASR 21. To be specific, the use of 'and/or' is specifically proscribed (and often the either or both case is rarely actually applicable) for use in government documents, and a Defence Manual, such as DASPMAN, is a government document.</p>	<p>The Australian Government Style Manual is the primary reference for authoring Defence documents and refers. The Australian Defence Force Writing Manual is the secondary source for authoring Defence documents but is replete with wrong examples. Regardless of the desire to directly replicate EMAR, incorrect English that affects meaning and creates ambiguity, must be corrected. Use of the forward slash in place of a conjunction and use of the 'and/or' option are specific problems with directly importing foreign content that need to be corrected.</p>	Noted	<p>DASA policy is to prioritise alignment of DASRs with EMAR. Therefore, editorial changes to comply with the Australian Government Style Manual or the ADF Writing Manual, or edits for other reasons, will generally not be made. Examples noted have been reviewed for clarity and edited if needed.</p>

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
		<p>DASR 21 has multiple examples in the IR, and in AMC and GM, where either or both:</p> <ul style="list-style-type: none"> a. multiple paragraphs are not numbered, which can make compliance management challenging for identifying what elements of an IR or AMC are applicable and met b. inconsistent number formats are used, which makes cross-referencing within DASR 21 invalid when the cross-reference format does not match the paragraph number format c. use of bullets in AMC and GM is further complicating. 			
		<p>Use of a forward slash or parenthesis to create an optional plural are both incorrect use of a forward slash and of parenthesis, respectively. Optional plurals are also often not needed and, when used, are often not grammatically consistent with the sentence in which used. That is, do not use optional plurals!</p>	<p>The Australian Government Style Manual is the primary reference for authoring Defence documents and refers. The Australian Defence Force Writing Manual is the secondary source for authoring Defence documents but is replete with wrong examples. Regardless of the desire to directly replicate EMAR, incorrect English that affects meaning and creates ambiguity, must be corrected.</p>		
		<p>Single quotation marks is baseline IAW:</p> <ul style="list-style-type: none"> a. Australian Government Style Manual, which is the primary authoring reference for Defence Manuals (and the DASPMAN is a Defence Manual) b. Australian Defence Force Writing 			

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
		Manual, which is a secondary authoring reference for Defence Manuals.			
		Consistency. No full stops in Latin abbreviations. DAVNOPS is using Latin abbreviations without full stops IAW the <i>Australian Defence Force Writing Manual</i> , which has been declared consistent with the DASR style guide.			
		The usage of e.g., with full stops, is compliant with the <i>Australian Government Style Manual</i> but not consistent with the precedent set by DAVNOPS for Flight Operations, Facilities and Service, and Cross Regulatory Requirements DASR.			
		The DASR 21 in-text notes are written in the form 'Note: Capitalised first word after the colon'. Only proper nouns are capitalised after a colon (or comma, semicolon, en dash, or em dash). Either: a. full stop after 'Note' b. lowercase first word after a colon when that word is not a proper noun or shortened form normally written in capitals.			

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
Many	Many	Paraphrased and summarised by DASA: Proposed wording is clumsy, overly verbose, or ambiguous.	Paraphrased and summarised by DASA: Clauses and the conditions which invoke them are ambiguous in their applicability or use.	Noted	Retention of the EMAR wording, within the context of DASR 21 in its entirety, is not considered to be ambiguous in its intent or described mechanisms.
10	NPA 2024-035 General OSD components	Are the components of the Operational Suitability Data (and Operational Suitability) <i>elements</i> (5 instances) or <i>constituents</i> (18 instances)?	Consistency	Not accepted	The words “constituents” and “elements” hold the same meaning, with the contextual difference being that “constituents” is only used to refer to the six areas of OSD, while “elements” is used across DASR 21 to refer to elements of certification bases (including elements of the OSD certification basis) as well as the areas of OSD.
11	DASR 21.1(k)(i)	Syllabus is an obsolete term in Australian training vernacular. An LMP consists of a curriculum (Section 2) and other sections. Hence DASR 21.1(k)(i) should read: the minimum learning management package of pilot type rating training, including determination of type rating		Not accepted	See comment 1 in the main body of the CDR.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
12	DASR 21.1(k)(i)	Depending on what DASA means by 'pilot type rating training', this may be over-reach in the Defence context: a. AFTG concurs with the OEM course for pilot type training if that is what is meant. b. AFTG does not agree that this is the MAO's aircraft type pilot conversion course, because that is the role of the Capability Manager and MAO to determine, governed under DASR Aircrew.10 and the <i>Defence Learning Manual</i> , and not of DASA (further, DASA does not have personnel qualified to do the verification of an LMP and thereby not appropriate for DASA to be the authority).		Not accepted	See comment 1 in the main body of the CDR.
14	DASR 21.1(k)(ii)	DASR 21.1(k)(ii) requires cross reference to DASR FSTD		Noted	Reference to DASR.FSTD is not considered to be required in the definition of OSD as part of 21.1(k). If FSTD validation data is to be incorporated into DASR.FSTD, reference to the relevant regulations may be made as AMC or GM to 21.A.17B, if appropriate.
21	AMC 21.A.14(b), para 3.2.3	Replace 'where' with 'when' in '... in environmental protection where applicable ...'.	The condition is the occasion (when) not location (where).	Noted	"Where Applicable" has been adopted throughout DASR 21 and is not considered to be incorrect or ambiguous.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
27	AMC 21.A.14(b), para 4.2	The structural repair manuals, maintenance manuals, engine and propeller manuals OIP, are not defined terms, hence not proper nouns. Whilst a specific manual is a proper noun, eg PC-21 Structural Repair Manual, a generic structural repair manual is a kind of manual, not the name of a manual.		Accepted	Erroneously capitalised in DASRs, incorporated to align with EMARs.
46	GM 21.A.15(c), NPA 2024-035, p B-6.	Potential unneeded specification First sentence in NPA 2024-035 on p B-6. Why does the AMC need to be identified in addition to the corresponding DASR? The AMC 21.A.15(b)(6) is automatically applicable by invoking DASR 21.A.15(b)(6).		Accepted	AMC 21.A.15(b)(6) is an incorporation of EMAR 21.B.100(a)(1) to (4). Reference to AMC removed.
58	GM2 21.A.15(d) heading 'cont.'	Do not use full stops in shortened forms.		Accepted	GM title amended accordingly.
59	GM2 21.A.15(d), first bullet	Revise GM2 21.A.15(d) for the same terms in DASR 21.1(k) cited for revision.	Note also the difficulty in identifying with element of the GM is referenced owing to inadequate numbering system.	Not accepted	See DASA response to comment 1 in the main body of the CDR.
60	GM2 21.A.15(d), second bullet	Revise GM2 21.A.15(d) for the same terms in DASR 21.1(k) cited for revision.	Note also the difficulty in identifying with element of the GM is referenced owing to inadequate numbering system.	Not accepted	
61	GM2 21.A.15(d), third bullet	Revise GM2 21.A.15(d) for the same terms in DASR 21.1(k) cited for revision.	Note also the difficulty in identifying with element of the GM is referenced owing to inadequate numbering system.	Not accepted	
62	GM2 21.A.15(d), fourth bullet	Revise GM2 21.A.15(d) for the same terms in DASR 21.1(k) cited for	Note also the difficulty in identifying with element of the GM is referenced	Not accepted	

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
		revision.	owing to inadequate numbering system.		
73	GM 21.A.91, para 3.5. NPA 2024-035, p B-14, fourth, fifth, and sixth bullets	The text: – titles, numbering, formatting, applicability; – order, sequence, pagination; or – sketches, figures, units of measurement, and correction of editorial mistakes such as: requires indenting a further level forming sub-bullets to 'do not change the intent of the OSD document, eg changes to:' under 'sketches, figures, units of measurement, and correction of editorial mistakes such as:'.	Note also the difficulty in identifying with element of the GM is referenced owing to inadequate numbering system.	Accepted	Formatting adjusted for clarity.
74	GM 21.A.91, para 3.5. NPA 2024-035, p B-14, seventh and eighth bullets	The text: – spelling – reference numbers. requires indenting a further level to that needed for the fourth, fifth, and sixth bullets forming sub-sub-bullets to 'do not change the intent of the OSD document, eg changes to:'	Note also the difficulty in identifying with element of the GM is referenced owing to inadequate numbering system.	Accepted	
81	GM 21.A.91, para 3.5. NPA 2024-035, p B-14, para (a)1(iii)(C).	Replace 'capability' with 'approval'.	The change cannot be a capability change because a capability change requires a design change, and the MMEL is a list of predetermined unserviceable equipments and associated authorisations and limitations.	Not accepted	In this context, the use of "capability" is referring to a change in what the aircraft is capable of. Capability changes may occur within the scope of an approval. The MMEL may be changed independently of an approval as a result of

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					additional data that may not trigger or be triggered by a design change.
126	GM1 21.A.239(a), para 3.1.4 u)	The role of the Office of Airworthiness is to be responsible for Design airworthiness (Continued Airworthiness), ICA, and OSD. Para u cites only Continuing Airworthiness and Operational Suitability, with no mention of Continued Airworthiness.		Noted	EMAR wording retained. The regulation context covers the activities of continued airworthiness without directly referencing it. Considered to appropriately communicate the intent of the regulation.
133	AMC1 21.A.243(a), para 1a	UAV is not a DASPMAN Glossary term. UA, UAS, and UAT are defined in DASPMAN, but not UAV. Hence, the 'uncrewed aerial vehicle' is not a DASPMAN proper noun and is not capitalised.		Accepted	Incorporated as green text.
152	GM1 21.A.243(d), para 2, third bullet, second sub-bullet	What is a 'minor revision to the aircraft flight manual'?		Not accepted	In the context of DASR 21, the criteria for a minor change to the aircraft flight manual is clearly defined (refer GM 21.A.91).
167	AMC1 21.A.263(c)(1), para 2.3.1	Replace 'Force Element Group/Wing' with 'Military Air Operator'.	The MAO is the whole air operator organisation and FEG and Wing do not relate to all Services.	Accepted	AMC1 21.A.263(c)(1), para 2.3.1 has been removed in its entirety.
168		Replace 'Air Warfare Centre' with 'Flight Test Organisation'.	AWC is not the only FTO.	Accepted	AMC1 21.A.263(c)(1), para 2.3.1 has been removed in its entirety.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
178	AMC1 to 21.A.263(c)(5), (8) and (9), para 1.1	<p>Is an Authority approval required when the major repair is both a new interpretation and applying an airworthiness code different to the one use for type certification, or either of those conditions requires Authority approval? Whichever, the applicability is set by the stem sentence, either:</p> <p>a. '... if the major repair involves both:'</p> <p>b. '... if the major repair involves either:</p> <p>after which the subparagraphs are then written: (a) a new interpretation of any item of the certification basis as used for the type certification (such as the airworthiness requirements, certification review items for special conditions, equivalent safety findings, deviations or 'elect to comply') (b) the application of an airworthiness code or standard that is different from the one used for type certification.</p>	Other than a full stop to end the final sentence, neither punctuation nor conjunctions are used at the end of a list of incomplete sentences.	Not accepted	Intent of EMAR to be taken as written, with the "and" term requiring both conditions to be true.
184	GM 21.A.265(h), para 2, second bullet	<p>1. What are 'instructions for continued airworthiness'?</p> <p>2. ICA is the shortened form for Instructions for Continuing Airworthiness not the shortened form for 'instructions for continued airworthiness.</p>		Accepted	Green text clarification incorporated.

LSN	NPA Reference: (ie Regulation number, NPA paragraph etc)	Comment or suggested change	Explanation	DASA Response Classification	DASA Response
185	GM 21.A.265(h), para 2, second bullet	ICA is the shortened form for Instructions for Continuing Airworthiness in the DASPMAN Glossary, which is already plural. Hence ICAs is not correct.	Note also the difficulty in identifying with element of the AMC is referenced owing to inadequate numbering system.	Accepted	Editorial change, incorporated with green text IAW LSN 184.
187	GM 21.A.265(h), para 2, fifth bullet	ICA is the shortened form for Instructions for Continuing Airworthiness in the DASPMAN Glossary, which is already plural. Hence ICAs is not correct.		Accepted	Editorial change, incorporated with green text IAW LSN 184.