

OTAR 39 v13.04 - LOG OF COMMENTS RECEIVED DURING THE CONSULTATION PERIOD 12 January 2026 to 7 April 2026

OTAR Ref	Date	Commenter	Comment Summary	Discussion/Decision	Status
OTAR 39 All	12/9/2025	Peter Davidson ASSI	Proposed changes for Issue 14 discussed at Airworthiness Seminar held 12 th Nov 2025. Agenda Topics 1 to 3.	For discussion.	Complete.
	11/12/2025	Peter Davidson ASSI	OTARs 21, 39, 43 and 145 drafted to feedback and circulated to OTAA's for comment.	For discussion.	Complete.
39.1	12/11/2025	Graham Rourke CAACI	<p>a. Regarding a slide covering Part 39.1 and aircraft below 2700 Kgs, was this suggesting that a CAMO is not required for all aircraft below 2700 Kgs? As stated in the requirement a Part 39.1 (b), a CAMO is required for 'the holder of an AOC shall have arrangements' This will be for all aircraft irrespective of weight and as further stated in OTAR Part 119.73(a). (I may have misinterpreted the side.)</p> <p>b. Where an AOC Operator contracts a Part 39 CAMO, the AOC Holders requirements should be addressed in the "Principal Contract (PC)". I get many questions from Operators and CAMOs as to the required contents of the PC. Suggest further guidance could be included in an OTAC.</p>	<p>The relationship between 39.51(a) and 39.51(b) was taken by some to mean that all aircraft regardless of weight or operating category, are required to be managed under a Part 39 Subpart E approval. However, 39.53(a) implies that aircraft below 2700Kg and not subject to an AOC are not included in the requirement to have an approval or principal contract to Part 39 Subpart E, just arrangements acceptable to the Governor. This seems to be the accepted practice in some OTAAs, therefore, 39.53(b)(1) and 39.87(b)(3) have been amended to remove the apparent conflict with 39.51(a).</p> <p>Agreed. This will be added to the agenda for next year's AW Seminar programme.</p>	<p>Complete.</p> <p>Complete.</p>
OTAR 39	12/1/2026	Peter Davidson ASSI	OTAR 39 draft version 13.04 published for public consultation.	Consultation period of 12 weeks agreed. Published on ASSI website.	Complete.
OTAR 39	7/4/2026	Peter Davidson ASSI	Consultation period closed.	No feedback received during public consultation.	Ready for publication in final version for Issue 14.