

QUESTIONS OF UNDERSTANDING

DRAFT v.15.03.2013

ISSUE	N°	QUESTION or COMMENT	ANSWER	Additional remarks
<p>Note: The following questions are based on our understanding of actual queries that were received from different NAAS and have been combined when concerning the same item/issue. The answers are therefore to be read accordingly. They have been prepared in coordination with the Commission and will be updated on the basis of the meeting discussions and circulated to all participants. Q & A in blue are additions resulting from the meeting discussions. The related answers may therefore be amended in the final version depending on the comments we may receive from the Commission.</p>				
Transition	1	<p>How to comply with:</p> <ul style="list-style-type: none"> - differing implementation dates for Part-CC, Part-MED and Part-ORO? - with Part-CC and EU-OPS? 	<p>Measures have been provided in the Regulations to allow the flexibility necessary during the transition.</p> <p>Further guidelines have been provided by the Commission.</p> <p>Therefore, once MS/NAA have identified how they will conduct the transition, this should be described in the implementation plan to be provided to the Commission and the Agency.</p> <p>In case of opt-out from Reg. 965/2012, EU-OPS Subpart O requirements (e.g. conversion training and recurrent training) may continue to apply until the end of the opt-out (e.g. 28 October 2014), instead of the corresponding requirements of Part-ORO (Subpart CC - ORO.CC) and of Part-MED (MED.C.) that are referred to in Part-CC, except that:</p> <ul style="list-style-type: none"> - The initial training programme and the new CCA format become applicable from 8 April 2013; and - Part-MED requirements from 8 April 2014. 	<p>Guidelines provided by the Commission can be found in the two Commission Staff working papers and associated Annexes:</p> <ul style="list-style-type: none"> - <i>“Transitional periods stemming from the Regulation(s) on Air crew”,</i> and - <i>“Transitional periods stemming from the Regulation(s) on Air Operations/Commercial Air Transport”</i> <p>These guidelines do not prevent that for example and provided it would be described in the implementation plan, MS/NAA may envisage implementing only Subpart CC of Part-ORO in advance of the end of their general opt-out of Reg. 965/2012.</p> <p>In such a case, as regards cabin crew rules, reference to both</p>

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				Regulations 1178/2011 and 965/2012 should be made.
Transition	2	With regard to cabin crew training and related attestations, which regulations should we follow after 8 April 2013?	For cabin crew completing initial training and to be issued a CCA, and for operators/training organisations holding the approval to providing such training and issuing CCA, Reg. 1178/2011 applies from 8 April 2013 and should be referred to where relevant.	Cabin crew members, who hold an EU-OPS attestation that is deemed compliant (as described above) and grandfathered, do not need to undergo initial training again. The applicable regulation for other training required for operations is Reg. 965/2012 (Part-ORO) from 24 October 2012, or EU-OPS until the end of the opt-out elected by the Member State/Authority (24 October 2014 at the latest).
Transition	3	To which regulation(s) should the new (revised) AOC refer to?	New (revised) AOC granted under Regulation (EU) 965/2012 should refer to this Regulation. AOC holders, still operating under EU-OPS during the transition period, shall have completed their adaptation and be ready to operate under an AOC complying with the new regulation at the latest by 24 October 2014. However, when other new regulations become applicable (Part-CC on 8 April 2013	As explained in the Commission working papers, during the transition/opt-out period, different operators of the same Member State may operate under one, or the other, regulation, for example, operators A and B operating as approved under the EU-OPS system, while other operators X and Y of the same Member

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			<p>and Part-MED on 8 April 2014), the related requirements automatically supersede the corresponding ones of EU-OPS.</p> <p>The Authority should therefore grant to the concerned operators/CC TOs, by 8 April 2013 the necessary approval in a separate document covering specifically Part-CC as relevant to the provision of initial training and the issuing of CC attestations. This approval will also cover ORO.AOC.120.</p> <p>This should be reflected accordingly in the implementation plan.</p>	<p>State would be ready to comply with the new rules before the end of the transition/opt-out period and be approved under the new regulation.</p>
Transition	4	<p>The 60 month obligation introduced by CC.CCA.105(b) should be applied as from 8 April 2013.</p>	<p>Correct. The 60 months will start counting from 8 April 2013.</p> <p>However, compliance should also be ensured with Article 11a point 2(c) which also requires holders of EU-OPS attestations who have not operated for more than 5 years to undergo again the initial training and the related examination.</p> <p>An EU-OPS attestation is deemed to comply with the new regulation and is 'grandfathered' if its holder complies with points 2(a), 2(b) or 2(c), as relevant to that holder, of Article 11a of Regulation 1178/2011.</p>	<p>See also guidance in the Commission Staff working paper on Aircrew Regulation, Annex I, paragraph on Cabin crew qualification and attestations</p> <p>As the applicability date of EU-OPS was 16 July 2008, existing EU-OPS attestations should have been issued less than 5 years before the 8 April 2013.</p>

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			Grandfathered EU-OPS attestations are considered 'equivalent' to a CCA until at the latest 8 April 2017 when they should have all been replaced by CCAs complying with the new regulation.	
		How to implement the 60 month rules to inspectors working for NAAs and who do not necessarily fly on a regular basis?	This issue depends on NAAs in the absence of common EU rules for CC inspectors and can be addressed in the upcoming rulemaking task on Authority inspectors' qualifications.	
		What about examiners? Should they be specifically appointed or can they be other instructors within the organisation?	The only requirement is that conflict of interest must be avoided, meaning that the person who provided the training cannot act as examiner	It is the responsibility of the authority to determine the conditions and qualifications of examiners until such provisions are defined at EU level.
	5	CC.GEN.025: Different date for Part-MED, so cannot comply fully	This is part of the transition period and should be mentioned in the implementation plan depending on the opt-out decided by the MS/NAA	See also answer to question 1
	6	CC.GEN.025: Cannot comply with full requirements of CC.TRA.225 because of Part-ORO opt-out until 28 October 2014	This is also part of the transition period and should be mentioned in the implementation plan depending on the opt-out decided by the MS/NAA.	See also answer to question 1
	7	Current legislation allows for related elements of Initial and Conversion training to be combined (OPS 1.1010(c). For this reason when the operators	This provision does not exist in the new regulation. However, such a temporary attestation could be envisaged. In such a case	On the longer term, a new AMC/GM to ARA.CC.GEN.100(b) could be considered.
Temporary Attestation ?				

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		<p>issue the Attestation themselves, they do this normally at the completion of the new entrant training course.</p> <p>MS/NAAs may decide to issue the CCA. In all cases, they have to establish procedures for processing and administration of the Attestations. Part CC GEN.025 specifies that cabin crewmembers may exercise the privileges etc. etc. only if they (b) hold a valid CC Attestation.</p> <p>Is there any provision within the legislation which allows for the issue of a form of temporary Attestation to allow time for the administration and processing associated with issue?</p> <p>e.g. a declaration of competency by the operator, similar to the provision allowed for temporary type ratings in pilot licensing, for a period of 2 months.</p>	<p>it should be specified:</p> <ul style="list-style-type: none"> - as a transition measure in the implementation plan of the MS/NAA; - in the procedures to be established by the Authority in accordance with ARA.CC.100(a), and - for consistency, with the condition that the temporary attestation shall be replaced with the official CCA within the same time period of 8 weeks as provided for pilots type rating. 	
<p>CCA format</p> <p>Appendix II to Part-CC EASA Form 142</p>	8	<p>8.1 Operators approved to issue CCA have asked to derogate from EASA Form 142 by issuing CCA in a smaller size of 85mm x 54mm, this being the standard size of a credit card commonly used for identity cards and security passes, and also considering that a smaller size would have no effect on safety.</p> <p>8.2 Some operators have expressed concerns that the format shown in Appendix II to ANNEX VI</p>	<p>If a smaller size of a document granted in accordance with Regulation (EC) No 216/2008 may not necessarily impact on the level of safety, Article 2 of that Regulation does set as principal objective a high uniform level of safety and other objectives which are all to be achieved as described in point 3 of that same Article 2 (e.g. uniform application of acts, recognition of certificates ... or other documents granted to [...] personnel [...], uniform implementation).</p>	<ul style="list-style-type: none"> • If a Member State decides to print the CCA in more than one language (i.e. English and National language) as provided for in instruction (c), and the required size and format provide enough space to print the attestation only in one language, our understanding is that the EASA Form 142 would be complied with if:

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		<p>PART-ARA will not be easily readable and thus the question arises whether it will be allowable to "split" the 12 data fields, i.e. to two or more pages 1/8 A4 (e.g. one sheet 1/8 A4 with printed text on front and reverse, one sheet 1/4 A4 with printed text on front and folded to 1/8 A4 format or one sheet 1/4 A4 with printed text on front and reverse and folded to 1/8 A4 format.</p> <p>8.3 Some operators want to put a photo of the holder on the new format of the cabin crew attestations, some don't. Does it have to be the same for all the operators?</p> <p>8.4 The format of the new cabin crew attestations as prescribed and illustrated in Appendix II to ANNEX VI PART-ARA seems to be too small to show all the 12 items required by the regulation. Could we use a format similar to the pilot licences of at least 1 fourth A4 folded once to 1 eighth A4 or 1 half A4 folded twice would be acceptable.</p>	<p>Cabin crew attestations are entitled to recognition by all Member States and subject to oversight by aviation authorities, they must be issued using the format and specifications established in Appendix II to Part-ARA, namely the standard EASA Form 142, as specified in ARA.CC.100(b).</p> <p>The related instructions need therefore to be complied with to ensure standardised implementation, hence to avoid confusion and ensure recognition without doubt or misunderstanding across the EU.</p> <ul style="list-style-type: none"> Appendix II to Part-ARA includes an EASA Form 142 that shows a precise order according to which the twelve required items shall be listed. Furthermore, the instructions in (a) clearly state that 'the CCA shall include all items specified in EASA form 142 shown in accordance with items 1-12'. 	<p>o one side (e.g. recto) would be printed in English (as shown in Form 142), and the other side (e.g. verso) printed in the national language, provided both sides are printed following the same instructions with the same 12 required items listed in the same order exactly as in Form 142; and</p> <p>o the CCA would be printed horizontally, although it can be seen printed 'more vertically' in the Appendix, hence taking into account that in the Appendix it is not exactly a one-eighth A4 size (due to formatting constraints).</p> <p>EASA Forms have the status of Implementing rules and, as such, cannot be derogated from unless under Article 14 'Flexibility provisions' of Regulation 216/2008.</p>
		8.5. <u>Item 8</u> . Should the competent authority provide an air operator with a competent	The instruction requires the competent authority's seal and logo to be shown. How	<u>This does not mean that each and every individual CC</u>

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		authority's official seal and logo, if an air operator has been approved to issue a CC attestation?	this may be done is left to the authority	Attestation shall be actually 'stamped' by the Authority. For example, when approving an organisation to issue CCA, some NAAs provide a copy of their seal and logo so that it can be printed into the CCA when being produced.
		8.6. <u>CCA material</u> : As the formulation regarding the qualities of the material to be used for the CC attestation in Appendix II to ANNEX VI PART-ARA, paragraph d) is identical to the wording in Appendix I to ANNEX VI PART-ARA, paragraph d) the question arises whether it would be sufficient to use normal paper for the CC attestations (in contrast to the pilot licences).	The material used must allow complying with the requirement to "prevent or readily show any alteration or erasures". Unless otherwise demonstrated, there is a common understanding that 'normal paper' cannot do so.	
CC.GEN.030	9	Interpretation by an operator that believes if they keep the attestation and can make it readily available, they are compliant, and do not need to issue the CCA, unless specifically asked to by the cabin crew member.	The intent of the last sentence of CC.GEN.030 is to give some flexibility, for operators to provide the necessary records, in case of inspection. It is NOT to contradict Article 11a of Reg. 1178/2011. The Aircrew Regulation is directed to flight crew and cabin crew members, while as specified in ORO.GEN.110, the operators have the responsibility to ensure that their flight crew and cabin crew members comply with the applicable requirements.	When in doubt how to understand a rule, such a rule should be read in the context of the whole Regulation which always clarifies the intention of the legislator. In point (c) of ORO.MLR.115, cabin crew attestations are listed as flight crew licences, hence the original documents are issued to, and kept by, the concerned

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			Similarly to FCM who are the holders of their licence, CCM are the holders of their CCA, responsible to keep it and to present it if requested to do so.	FCM or CCM, and copies are kept by operators employing their services.
EU-OPS attestations		Should Article 11a point 2(a) and (b) be understood as denying recognition/grandfathering of EU-OPS attestations held by persons who are not in position to fly and to complete all training and checking required by EU-OPS (e.g. unemployed, temporarily grounded for diverse reasons)?	Article 11a point 2 does not effectively address these particular situations. They will be further considered in coordination with the Commission and MS NAAs will be informed accordingly.	
Carrying the CCA when on duty	10	Does the phrase: " ..., each holder shall keep, and provide upon request, the cabin crew attestation, the list and the training and checking records of his/her aircraft type or variant qualification(s), ... " under CC.GEN.030 mean that it is sufficient for the cabin crew member to keep the attestation e.g. at home and submit it within a certain period of time or does it mean that the attestation has to be carried. With the new 1/8 A4 format, we think a requirement for cabin crew members to carry the attestation on each flight would be reasonable.	<p>As mentioned above, the rule provides some flexibility, as follows: CCM may keep the attestation e.g. at home and submit it, without undue delay, upon request.</p> <p>Each CCM may also elect to carry it when on duty.</p>	Also, operators may establish in their procedures that the CCM should carry their attestations, which would facilitate e.g. ramp checks, competent authority random checks, checking by Commander or Senior CCM if considered needed, etc. This seems to be a policy currently being developed by some operators.
Initial training programme Part-CC	11	11.1 If the Cabin crew members were given an EU-OPS attestation less than 5 years before the EASA OPS Regulation applies 28th of October 2014, will the CC have to undergo an additional initial	If referring to currently flying cabin crew members who have been issued a safety training attestation, in accordance with the applicable EU OPS requirements, up to a maximum of 5 years before the new Aircrew	See the Commission Staff working paper – on Aircrew Regulation: "EU-OPS attestations not used in CAT for more than 5 years are

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versus EU-OPS		training based upon Part-CC?	Regulation (1178/2011) is applicable (8 April 2013), this attestation is grandfathered and there is no need for them to undergo again the initial training. In all cases, EU-OPS attestation holders shall comply with points 2(a) and 2(b) of Article 11a (see also answer to question 4 above)	not grandfathered. His/her holder shall complete the initial training course and pass the related examinations as required in Part-CC.”
		11.2 Can we request from operators to perform additional trainings for CC personnel with valid attestation to fill difference between old and new training syllabus (some additional topics)? Please remember that they benefit from grandfather rights.	Active cabin crew qualified in accordance with EU-OPS and holding a grandfathered EU-OPS attestation do not need to perform initial training again.	The only additional topics they may have not been trained on under EU-OPS are the medical items ‘Eustachian tubal function and barotraumas’. MS/NAA should specify in their implementation plan how operators will ensure that these items will be covered (e.g. under recurrent training).
Security training	12	If an operator complies with Part-CC Security training, they are not compliant with their NASP as this part of the training will sit in ORO.CC but is not in OPS 1.1010/15	This should be addressed as a transition measure in the implementation plan to be developed by MS/NAA, to ensure there is no gap.	MS/NAA having opted-out from Reg. 965/2012 may consider excluding Part-ORO Subpart CC from the opt-out. In such case, this should be described in the implementation plan.
Aeromedical and First Aid training	13	New items of training in Aeromedical Aspects and First Aid will need to be part of the operators’ OM but not yet required to be part of Recurrent	Aeromedical Aspects and First Aid recurrent training syllabus is not specified in details in Part-ORO. It is understood that it should be the same as it is under EU-OPS.	As clarification may be needed, adding a reference or a new AMC/GM may be envisaged.

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<p>NAAs CCA oversight ARA-CC</p>	14	<p>14.1 With ref. to CC.GEN.001</p> <p>This is quite ambiguous and needs a clarification taking into account that organizations can be approved to issue CC attestation which means that an organisation will be the place where a CC will apply for a CC attestation. CC.GEN.001 current wording stipulates that even if an organization is approved to issue a CC attestation the competent authority (namely NAA) still remains the place where a CC applies for the issue of a cabin crew attestation</p>	<p>CC.GEN 001 means <u>the Member State where ...</u></p> <p>When the Authority is referred to, the text says <u>the Authority to whom</u> a person...</p>	<p>When in doubt how to understand a rule, such a rule should be read in the context of the whole Regulation which clarifies the intention of the legislator.</p>
		<p>14.2 With ref. to CC.GEN.015.</p> <p>If the competent authority has approved an organization to issue a CC attestation, should it be the competent authority or the organization establishing a form and manner for the application for a CC attestation?</p>	<p>It is the role of the Authority, as part of the procedures to be established as required by ARA.GEN.100(a), to ensure that it is done following the same 'form and manner' by all operators/TO approved to issue CCA.</p>	
		<p>14.3 With ref. to CC.CCA.105.</p> <p>CC attestation remains valid unless its holder has not exercised the associated privileges during the preceding 60 months on at least one aircraft type. However, CC.CCA.110 stipulates that CC attestation may be suspended or revoked by the competent authority if holder does not comply with Part CC, meaning that CC attestation may be suspended or revoked when</p>	<p>Counting from 8 April 2013, when exceeding 60 months without operating on at least one aircraft type , the CCA is automatically no longer valid, meaning that the CCM must complete initial training again.</p> <p><u>The CCA should then be re-issued, or revalidated with the new date, in accordance with the procedures established by the authority.</u></p>	

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		<p>exceeding 60 months without exercising CCM privileges. The question is, how the competent authorities will ascertain that CC has exercised his/her privileges in situations where CC has moved to an operator based in another Member State?</p>	<p>This type of situation already exists for other personnel. Similar procedures may be considered by the authority for CCA. Also CCM should be able to show their training records and rosters as provided by the operator employing their services.</p>	
		<p>14.4 The competent authority shall be the entity to limit, suspend or revoke a cabin crew attestation in case of non-compliance of its holder with the requirements. For this purpose, they will have to supervise the validity of CC attestations issued in their country e.g. under the aspects of aero-medical fitness, training and practical experience within the last 60 months of the cabin crew member concerned. How can supervision be assumed in the case of a cabin crew member working with an EU operator outside his/her country?</p>	<p>As above, this type of situation already exists for other personnel. Similar procedures may be considered by the authority for CCA, including coordination with the authority of the other MS where the CCM works.</p>	
		<p>14.5 ARA.CC.100 (a) Not clear whether ARA.GEN.315, ARA.GEN.220 and ARA.GEN.300 are also applicable to air operators and training organizations in case they are approved to issue CC attestation. And again should it be only competent authority who establishes procedures for CC attestation, record-keeping or air operator and training organization</p>	<p>ARA requirements are directed to Authorities, not to approved operators/CC TO. The Basic Regulation 216/2008 provides to MS the flexibility to approve operators/CC TO <u>only</u> for the issuing of CCA, <u>not</u> to replace the authority in its other tasks/roles such as record-keeping and oversight.</p>	<p>See also answer to question 14.1 above</p>

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		becomes a competent authority after receiving and approval to issue CC attestation?		
		14.6 Part CC refers only to the Initial training course and examination. The question is - why ARA.CC.200 says "approval of organisation to provide cabin crew training or to issue cabin crew attestation" and not "approval of organisation to provide initial cabin crew training or to issue cabin crew attestation"?	It means the training covered by Part-CC, which is initial training. Other training are specified in Part-ORO and are approved as part of the AOC OM.	See also answer to question 14.1 above
		4.7 If a CCA is issued for example by AT, then the holder works in Ireland and gets married and changes name/identity, does the CCA have to be sent to Austrocontrol or can it be re-issued by IAA?	Up to the two concerned NAAs to decide after coordination, provided the first CCA is revoked before the new replacing one is issued, so that record-keeping is accurate and proper oversight ensured.	A CCM may hold only one CCA at all times.

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		14.8 What if a CC is changing her name by e.g. marriage or other reasons?	These situations should be covered by the procedures to be established by the Authority as required by ARA.CC.100(a), as appropriate to the concerned MS.	Item 4 of Appendix II to part-ARA specifies that the name should be the same as stated in the official identity document of the holder. <i>In all cases, a CCM may hold only one CCA at all times. If a new CCA has to be re-issued, the first CCA must be revoked before the new (replacing/updated) CCA is issued.</i>
		14.9 What if the CC by accident destroys, loses her CCA or somebody steals it?	See answer to question 14.7. above	
CC TO Cabin crew Training organisation	15	15.1 Will the Commission and EASA issue any requirements for CC training organisations (not operators) in addition to what is already in Part-CC/ARA.CC?	Specifying common technical standards at EU level for cabin crew training organisations (CC TO) has been suggested by many commentators during the Consultation process to NPA and CRD 2009-02, and seems to be a view widely shared and supported, even though the task to the Agency to develop such standards is not specifically mentioned in the Basic Regulation.	This depends on a rulemaking task (RMT) to be included in the rulemaking programme, after consultation of the EASA Consultative bodies.

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		15.2 Has EASA or the Commission made any analysis of what requirements there are today/have been earlier in different EU member states on CC training organisations, who give initial training for cabin crew?	This has not been done to our information. Such an EU wide survey/study could be envisaged if considered necessary after assessment of the issue.	
		15.3 Should member states revoke their national requirements for approving TO for CC?	<p>ARA.CC specifies general principles to be followed by the competent authority when approving such CC TO.</p> <p>Part-ORA requirements for training organisations (Subpart ATO – ORA.ATO) are only applicable to ATO for flight crew licensing.</p> <p>There is therefore no reason to require Member States to revoke their requirements, hence until such common technical standards for CC TO are developed at EU level. In other words, any such currently applicable national requirements may continue to apply.</p>	<p>It should be noted that a CC TO approval granted by one Member State is not entitled to mutual recognition across the EU.</p> <p>However, CC attestations that would be issued by such approved CC TO to individuals, thus in accordance with Part-CC, would indeed be recognised across the EU.</p>
		15.4 May a CC TO located outside the EU be approved?	Approval of CC TO is the responsibility of the MS/NAA and can be granted if in accordance with ARA.CC.200 and applicable national technical standards and requirements.	Mutual recognition of CC attestations across the EU should be taken into account by MS NAAs when considering granting an approval to CC TO located outside EU

QUESTIONS OF UNDERSTANDING

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		15.5. If the manuals and programmes are approved by an EU MS, may a CC TO conducting training in a third country be approved by that third country authority?	CC TO in a third country must be approved by the EU MS and be under the oversight of that EU MS.	See also above
Subcontracting of training		May an operator subcontract parts of the training?	Subcontracting conditions remain the same as in EU-OPS. They are specified in Part-ORO and the operator remain responsible in all cases. As regards the initial training, this is different as it requires a particular approval by the authority and must be added as such in the AOC specifications. It is the responsibility of NAAs to assess whether it is acceptable before granting the approval as an additional privilege to the AOC.	
Wet-lease		Wet-lease of non-EU operators will be stopped because of Part-CC. This is a serious problem.	Wet-lease requirements are not specific to cabin crew and have not changed. This may therefore result from a misunderstanding of EU-OPS requirements.	
Part-MED		How should MED.C.005(b) be understood when referring to 'at intervals of maximum 60 months'?	During the EASA Committee discussion, it was concluded that some flexibility should be given to MS taking into account the vast diversity of national practices with regard to CC aero-medical assessment. In other words, a MS may decide to require in their territory intervals shorter than 60	It is understood that if a CCM moves from one MS to another, the validity period to be applied is that specified by the MS where the CCM works.

QUESTIONS OF UNDERSTANDING

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			months, hence in accordance with their medical practices.	