



Cologne, 05 January 2012

-Information letter-

Dear All,

Firstly, on behalf of the Agency and of all the EASA "Foreign 147" group, I would like to wish you, your families and your organisations a very Happy and Prosperous New Year.

This year will be an important "transition year" in the field of Part 147 training.

In effect, you will be aware that for a few years a number of proposed regulatory changes affecting our scope of activity have been "cooking". After a lengthy maturing process involving the Competent Authorities of EU Member States, the Commission and Industry, these changes will finally become live during the course of 2012.

This will result in a temporarily increased workload for both the training organisations and their surveyors. With this in mind, anticipation and communication with your surveyors should make this transition as smooth as possible. But in the end, I am confident that it will also bring more clarity and harmonisation in our perception and implementation of Basic and Type training activities.

Below, we propose to you an update on the coming changes, and clarification on the corresponding timescales.

with Best Regards,



Frédéric MUR

Approvals and Standardisation Directorate

European Aviation Safety Agency



A/ Entry into force of regulation 1149/2011

As you are probably now aware, regulation 1149/2011 has been issued which amends reg.2042/2003 and in particular parts 66 & 147.

The document can be found by using following link:

<http://easa.europa.eu/regulations/regulation-EC-2042-2003.php>

A number of important changes have been introduced into this amendment. An overview is provided hereafter, however please note that this list is not exhaustive and an extensive review of the new text is required by the approved training organisations. Where applicable, changes must be implemented with consideration to the deadlines as defined in the new text.

Regarding the deadlines, a clarification is provided hereunder:

“Article 2

This regulation shall enter into force on the first day following its publication in the Official Journal of the European Union.”

It means the new regulation entered into force on 17 November 2011. However:

“this regulation shall apply from the first day of the ninth month following its publication in the official Journal of the European Union, except for point 3(i) of article 1 [NDLR piston-engine non-pressurised aeroplanes of 2 000 kg MTOM and below and ELA1 aeroplanes not involved in commercial air transport] that shall apply on the first day following its publication.”

This means that –except for article 1 point 3(i)- the new regulation only applies from 01 August 2012. As a consequence, the previous version of Part 66 remains in force until 01 Aug. 2012.

Additionally, *article 1, (2)* quotes:

“ in article 6, the following paragraphs are added:

3. Basic training courses complying with the requirements applicable before this regulation applies may be started until 1 year after the date by which this regulation applies. Basic



knowledge examinations conducted as part of these courses may comply with the requirements applicable before this regulation applies.

4. Basic knowledge examinations complying with the requirements applicable before this regulation applies and conducted by the Competent Authority or conducted by a Maintenance Training organisation approved in accordance with Annex IV (Part-147) while not being part of a Basic Training course, may be conducted until 1 year after the date by which this regulation applies.

5. Type Training courses and type examinations complying with the requirements applicable before this regulation applies shall be started and finished not later than 1 year after the date by which this regulation applies.”

This means that these courses and examinations do not need to comply with the new requirements until 01 August 2013.

However, in order to anticipate the large number of courses that may require a re-assessment by the surveyors before Aug 2013, it is advised to develop and to implement the organisation's Training Need Analysis (TNA) procedure at the earliest opportunity. In effect, iaw the revised Part 66 appendix 3, all Type Training course durations and content will now have to be supported by a documented TNA. This also includes courses previously approved. The TNA procedure will have to be reviewed & accepted by your surveyor through an amendment of the organisation's MTOE. Its effective implementation and efficiency will be assessed through samplings.



B/ Acceptable Means of Compliance (AMC) and Guidance Material (GM)

The Agency is in the final stages of preparing consolidated AMC for the consolidated Part 66. This will be issued in the coming months and well in advance of the application date of the regulation -1st August 2012.

C/ EASA standard for Part 147 instructors, knowledge examiners and practical assessors

147.A.105 (Personnel requirements) quotes:

- (f) The experience and qualifications of instructors, knowledge examiners and practical assessors shall be established in accordance with criteria published or in accordance with a procedure and to a standard agreed by the competent authority.

The Agency has produced a document (“User Guide for applicants”) which, in particular, defines the essential criteria to be met by an applicant to an instructor, knowledge examiner or practical assessor’s position.

The User Guide will shortly be posted on the EASA website as well as other documents such as the “course approval form” templates. However, an advance copy is attached to this letter.

The training organisation’s procedures related to the nomination of such educational & examination staffs shall be amended to explain how candidates are assessed for compliance to these criteria before their appointment becomes effective.



Implementation time frame:

A provision has been included into the User Guide in order to allow the “grandfathering ” of educational & examination staffs who are already exercising their Part 147 privileges at the time of the publication of these criteria.

Additionally, the training organisations are granted a transition period of 3 months from now in order to amend their procedures (MTOE, etc..).

By derogation to the User Guide para. 8.8 (“entry into force”), training organisations are therefore expected to implement the criteria for new instructors, examiners and assessors no later than 1st April 2012.



Main changes introduced by Regulation 1149/2011 in parts 66 & 147 (list not exhaustive)

- A new category of licence has been introduced (B3) for piston-engine non-pressurised aeroplanes of 2 000 kg MTOM and below,
- B2 certifying staff privileges have been extended, and consequently the appendixes 1, 2 and 3 of Part 66 (training and examination standards) have been amended,
- New requirements have been introduced into the appendix 3 (Type Training syllabus & examination); there is also now a need to comply with minimum durations and to produce a Training Need Analysis (TNA) in order to justify the actual durations and content of courses.
- Requirements related to the practical elements of the Type Training have been developed, and the 4 months minimum duration has been removed,
- OJT is not considered as type training under part 147 regulation, and cannot be delivered by or under control of an approved Part 147 organisation,
- Training organisations must keep student training, examination and assessment records for an unlimited period,
- An approved organisation may now provide type examinations without being approved to conduct the corresponding training. This new privilege however only applies to those aircraft types that do not require a Part 147 training and only require an examination iaw Part 66 appendix 3. Please refer to 66.A.45 (d).
- Certificates of Recognition templates must be amended to include more information.