

CRD - AMC to Part 66

Comment	Response
<p>AMC 66.A.20</p>	
<p>Paragraph (a)</p>	
<p>Cmt. 18 / DGAC, France</p>	
<p>Propose to delete paragraph. JUSTIFICATION:</p> <ul style="list-style-type: none"> -The definition of line and base maintenance appears to be essential for the implementation of the rule and thus should be included in the rule of Part M and Part 145 -There is, however, an important need of definition concerning the limits of the category B1 and B2 qualification scopes. A new AMC 66 about the subject should be elaborated in the adequate EASA Group. -These definitions could be better defined in accordance with the appendix 1 of Part 66 which should follow the type of references shown below: Category B 1.1 : module 11(a), 15 and 17, Category B 1.2 : module 11 (b), 16 and 17, Category B 1.3 : module 12, 15, Category B 1.4 : module 12, 16, Category B 2 : module 13, 14. <p>The limits of the privileges between B1 and B2 categories should be better defined using reference to the basic training syllabus. It is not clear for everyone, after having read the limits of the B2 scope of Part 66, that B2 is not competent in ATA 21, 26, 28, 29, 30, 32, 35, 36, 38, ...because he did not receive any training on this subjects.</p>	<p>Item 1: Existing JAA Text (TGL 6).</p> <p>Item 2: This issue is found to be sufficiently addressed in the regulation.</p> <p>Item 3: In the basic training, the subject of ATA chapters is only addressed in certain modules and therefore the other modules with the right type training can cover some areas. The border between B1 and B2 depends on the aircraft type.</p> <p>No text changed.</p>
<p>Cmt. 29 / CAA-UK</p>	
<p>Definitions are a key part of IR66 and should be moved to the implementing rule</p>	<p>This is not a definition. "Line maintenance" is a reference to the Part-66 text that further developed.</p> <p>No text changed.</p>

Comment	Response
AMC 66.A.25	
Paragraph	
Cmt. 7 / CAA Norway	
There should be a basic examination cross crediting possibility between various Part-6 categories/sub-categories and the corresponding modules. For insyance an passed exam in module 11a) should cover 11b), a passed exam in Module 5 B2 should cover B1.1, B1.2, B1.3 and B1.4 etc.	This work is ongoing in the JAA and will be transferred to EASA. No text changed.
Paragraph (b)	
Cmt. 18 / DGAC, France	
Editorial should be AMC 66 A 25 (a) instead of AMC 66 A 25 (b) 4.JUSTIFICATION: Should be sub-paragraph (a) not (b)	Text changed.
Cmt. 29 / CAA-UK	
The referenced paragraph relates to full or partial credits, not examinations. The referen should be to AMC 66.A.25(a)	Text changed.

Comment	Response
AMC 66.A.30	
Paragraph (a)	
Cmt. 32 / The Royal Aeronautical Society	
We believe that an additional requirement should be added to ensure that Category C Licence holders should cover (at least) Modules 9 and 10, as these may not have been covered sufficiently in the syllabus of a technical degree.	This is addressed in AMC 66.A.25 (b) 1. No text changed.
Paragraph (a) 2	
Cmt. 18 / DGAC, France	
Amend the § 2 as follows: While an applicant to a Part 66 category C licence may be qualified by having 3 years experience as category B1 or B2 certifying staff only in line maintenance, it is however recommended that any applicant to a category C holding a B1 or B2 licence demonstrate at least 12 months experience as a B1 or B2 base maintenance support staff. 4.JUSTIFICATION: The 12 months experience as B1 or B2 base maintenance support staff is not required in the Part 66 rule. This requirement of a "sufficient experience" will be assessed during the category C certifying staff evaluation process that a JAR 145 maintenance organisation has to conduct.	Existing JAA Text (TGL 37).
Paragraph (d)	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. JUSTIFICATION: This might be better placed in the rule (See DGAC comment n°72 on 66.A.30(d))	Existing JAA AMC text. No text changed.
Cmt. 29 / CAA-UK	
The definition of recent is too broad. The definition permits, in a worst-case scenario of, three years of practical maintenance experience on operating aircraft gained over 7 plus years, 6 months of that being within the last 7 years and 6 months of it being within the 12 months prior to the application. PROPOSED TEXT To be considered as recent experience, at least 50% of the required 12-month experience should be gained within the 12-month period prior to the date of the application for the Part 66 aircraft maintenance license. The remainder of the total experience required for license issue should have been gained within the 3-year period prior to the application.	Existing JAA text. No text changed.
Paragraph (e) 1	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. JUSTIFICATION: This might be better placed in the rule (sub-paragraph 1 only). See DGAC comment n° 72 on 66.A.30.	Existing JAA AMC text. No text changed.

Comment	Response
AMC 66.A.45	
Paragraph	
Cmt. 15 / Lufthansa Technik AG	
<p>The requirements specifying Type Training Courses have been upgraded from Guidance Material (TGL 40) to AMC Material thus confronting the industry with new requirements. As this AMC is written, it can be interpreted (and is already interpreted) by competent authorities of member states in a way that qualification of certifying staff cannot any longer be conducted in more than one step. As a matter of fact most maintenance organisations in the airline industry have established qualification-schemes over the past decades for their mechanics and technicians (under JAR-145: authorization for work performance) and need to qualify this population by "delta"-type-rating-courses onto the required level of Part-66 and Part-147 once they shall be nominated and licensed as certifying staff. A full – ab initio - training is not necessary as this personnel has already been trained but to a lower level than B1 or B2 years before and has gained a lot of experience on the aircraft type concerned. As this AMC Material is written, it can be understood, that only one conclusive (and complete) type rating course and examination will be accepted (except modular setup according to AMC 147.A.105.).</p>	<p>Existing JAA text thoroughly discussed and accepted by the JAA and interested parties. No text changed.</p>
Paragraph (a)	
Cmt. 18 / DGAC, France	
<p>-It is necessary to develop an appropriate AMC dealing with the term "appropriately approved Part 145 organisation" for task training.</p> <p>-We consider that "subpart F of Part M" organisation should be listed in these "appropriately approved organisations for task training".</p> <p>4.JUSTIFICATION: See DGAC comment n°73 on 66.A.45</p>	<p>Item 1: Text changed.</p> <p>Item 2: Subpart F organisations are not required to have a quality system and do not use Part-66 category A certifying staff. Therefore this is not possible. No text changed.</p>
Paragraph (d) 5	
Cmt. 15 / Lufthansa Technik AG	
<p>The requirements concerning the detailed practical training records are new and compared to the present industry standard overdone. There is no substantiation for this additional requirement.</p>	<p>Existing JAA text. (TGL 40) No text changed.</p>
Cmt. 16 / Lufthansa Technik	
<p>The requirements concerning the detailed practical training records are new and compared to the present industry standard overdone. There is no substantiation for this additional requirement.</p>	<p>Existing JAA text. (TGL 40). No text changed.</p>

Comment	Response
Paragraph (h)	
<p>Cmt. 18 / DGAC, France</p> <p>DGAC disagree with the management of type qualification on the licence for light non complex aircraft.</p> <p>4.JUSTIFICATION:</p> <p>Management of these qualification would require huge means (we have to remember that FAA licence do not even list large aircraft types). This could be managed by the approved organisation or by the individual himself by producing on request evidence of type qualification.</p>	<p>The licence for light aircraft was developed in an NPA to JAR-66, the content of which was thoroughly discussed and accepted by the JAA and interested parties.</p> <p>No text changed.</p>
<p>Cmt. 29 / CAA-UK</p> <p>This paragraph states the requirement for type experience. i.e. First type 50%, second type 30% and third type 20%. As this applies to an applicant for a Group rating, these levels of experience are not sufficient to demonstrate an appropriate breadth of knowledge of different system representative of the Group.</p> <p>PROPOSED TEXT</p> <p>1. Type experience should cover an acceptable cross section of tasks from Appendix 2. The experience gained should represent 50% of the tasks listed for each type within a manufacturers group.</p>	<p>Proposed text found to be too stringent, no text developed to cater for this comment.</p> <p>Text changed but not as requested.</p>

Comment	Response
AMC 66.A.50	
Paragraph	
Cmt. 18 / DGAC, France	
Propose to delete paragraph. JUSTIFICATION: See DGAC comment n° 74 on 66.A.50	Existing JAR-66 text. No text changed.
Cmt. 29 / CAA-UK	
Paragraph 4 defines mental condition; the definition would however require expert medical interpretation or additional guidance material.	Existing JAR-66 text. No text changed.
Cmt. 29 / CAA-UK	
Paragraph 2 does not have an outcome. PROPOSED TEXT 2. The use of any legally administered drug, or medicines, including those used for the treatment of a disease or disorder, which has been shown to exhibit adverse side effects which affect the decision making ability of the user, should be administered according to medical advice and its impact considered as it applies to continued working.	Existing JAR-66 text. No text changed.

Comment	Response
AMC 66.B.100	
Paragraph	
Cmt. 29 / CAA-UK	
Throughout the AMC the term 'Member State' and 'Competent Authority' appear to have been inter changed. Classic example is contained in 66.B.100 paragraph 4.	Text changed.
Paragraph 1	
Cmt. 20 / CAA Netherlands	
AMC 66.B.100 1., 2. and 3. deal with the applicant and therefore should be in the A section.	Text changed.
Paragraph 2	
Cmt. 20 / CAA Netherlands	
AMC 66.B.100 1., 2. and 3. deal with the applicant and therefore should be in the A section.	Text changed.
Paragraph 3	
Cmt. 20 / CAA Netherlands	
AMC 66.B.100 1., 2. and 3. deal with the applicant and therefore should be in the A section.	Text changed.

Comment	Response
AMC 66.B.105	
Paragraph	
Cmt. 18 / DGAC, France	
Last sentence is not clear. Some words are probably missing: "In the case of computer generated licences, the licence should be reissued." ??? when, for what,...	Text changed.
Paragraph 1	
Cmt. 25 / LBA, Germany	
Replace '12 months' with '24 months', because the audit period for Part 145 approved maintenance organization is 24 months. 4.	Existing JAA Text. (Chapter 22) No text changed.

Comment	Response
AMC 66.B.100 to 115	
Paragraph	
Cmt. 18 / DGAC, France	
<p>This AMC includes aeroplanes type certificated in JAA member States and does not include:</p> <ul style="list-style-type: none"> i. aeroplanes not type certificated in accordance with FAR/JAR 23, FAR/JAR 23 Commut Category, FAR/JAR 25, BCAR or AIR 2051; ii. Aeroplanes type certificated in a JAA member State under special registration such as military, ex-military, experimental or vintage aeroplanes; <p>Aeroplanes not listed may be entered into a JAR-FCL licence, but the rating privileges are restricted to aeroplanes on the register of the State of rating issue.</p> <p>Explanation of table</p> <ul style="list-style-type: none"> a. the symbol (f) between variants of types of aeroplane certification indicates familiarisation training; b. the symbol (d) between variants of types or different types of aeroplane certification indicates differences in training; c. the licence endorsement will include all variants within an a/c certification even when the required familiarisation or difference training as indicated in the table has not been performed. The specific variant on which the skill test for the type rating has been performed will be underlined in the licence endorsement. <p>When establishing the list of rating, it is highly recommended to copy the principles of familiarisation and differences training set forth in the JAR FCL, in particular the AMC FCL1.215 List of class of aeroplanes and AMC FCL 1.220 List of type of aeroplanes, because those lists are well used as reference in the aviation community.</p>	<p>Existing JAA Text. (Appendix 3, Chapter 22)</p> <p>No text changed.</p>
Cmt. 34 / ASA Sweden	
<p>The AMC should be removed and inserted in its proper place, i.e. before AMC 66.B.100. This way, it will be easier to find for a user.</p>	<p>The important information is in Appendix 1. This AMC just refers to Appendix 1.</p> <p>No text changed.</p>

Comment**Response**

AMC 66.B.135

Paragraph

Cmt. 18 / DGAC, France

"The scope of the national licence qualifications and the Part 66 licence qualifications should be compared on the basis of a detailed analysis of the national and Part 66 basic qualification standards. The report should identify where a difference between the two standards exists. The report should show where such a difference would lead to a limitation on the Part 66 licence."

4.JUSTIFICATION:

Coherence with the rule
Not all Member States have national licenses

Text changed.

Comment	Response
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Appendix 1

Paragraph

Cmt. 11 / Foca Switzerland

Expressions in the scope of Part 145 and PartM/Subpart F Approvals (page 2 of EASA Form 2) shall be harmonised with expressions of ratings in the Part 66 Aircraft Maintenance Licence. This is especially important in case of series.	This is the existing JAA rating system for licences. No text changed.
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Cmt. 18 / DGAC, France

<p>This AMC includes aeroplanes type certificated in JAA member States and does not include:</p> <ul style="list-style-type: none"> i. aeroplanes not type certificated in accordance with FAR/JAR 23, FAR/JAR 23 Commutator Category, FAR/JAR 25, BCAR or AIR 2051; ii. aeroplanes type certificated in a JAA member State under special registration such as military, ex-military, experimental or vintage aeroplanes; <p>Aeroplanes not listed may be entered into a JAR-FCL licence, but the rating privileges are restricted to aeroplanes on the register of the State of rating issue.</p> <p>Explanation of table</p> <ul style="list-style-type: none"> a. the symbol (f) between variants of types of aeroplane certification indicates familiarisation training; b. the symbol (d) between variants of types or different types of aeroplane certification indicates differences in training; c. the licence endorsement will include all variants within an a/c certification even when the required familiarisation or difference training as indicated in the table has not been performed. The specific variant on which the skill test for the type rating has been performed will be underlined in the licence endorsement. <p>When establishing the list of rating, it is highly recommended to copy the principles of familiarisation and differences training set forth in the JAR FCL, in particular the AMC FCL1.215 List of class of aeroplanes and AMC FCL 1.220 List of type of aeroplanes, because those lists are well used as reference in the aviation community.</p>	<p>Existing JAA Text. (Appendix 3, Chapter 22)</p> <p>No text changed.</p>
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Comment

Response

Appendix 2

Paragraph

Cmt. 31 / *Martinair Holland NV*

We recommend to use ATA 104 numbering in AMC 66 Appendix 2

ATA numbering is not stable but it can be individually used for practical application Part-66.

No text changed.

Comment	Response
General Comments	
Paragraph	
Cmt. 18 / DGAC, France	
As AMCs are not mandatory, the terms "must", "shall" and perhaps "should", should be removed from the text. The use of the expression "may" would prevent any confusion introduced by ambiguous terms.	Text reviewed and changed where applicable.
Cmt. 29 / CAA-UK	
To properly consider the validity and applicability of this AMC material, it is essential to carry out this task in conjunction with the implementing rule Part 66. As this has not been possible, the comments made on the AMC material are based upon CAA comments made on IR 66.	The AMC are Agency documents and can therefore be amended through a process deferring for the EU decision making process.
Once IR 66 has been agreed it will be necessary to carry out a further review and reconsider the contents of this AMC Material.	No text changed.
Cmt. 31 / Martinair Holland NV	
According to the Explanatory Note some Leaflets are not incorporated into AMC or GM of AMC 145 we recommend to incorporate the following leaflets into AMC or GM to Part 145: -Leaflet 12: JAR 145 Release to Service after incomplete maintenance -Leaflet 13: JAR 145 Release to Service-Single/Multiple Signature -Leaflet 16: JAR 145 Release to Service & The JAR OPS Tech Log. -Leaflet 18: JAR-145 Approval of Expositions with extensive procedures -Leaflet 21: Combined JAA Form One and FAR Part 43 Return to Service for JAA/FAA customer -Leaflet 22: JAA Acceptance of USA Repair Stations -Leaflet 23: JAA Acceptance of Canadian Approved Maintenance Organisations	These JAA TGLs are not Part-66 material.
Cmt. 34 / LUFTFARTSVERKET, Aviation Safety Authority (ASA)	
Regulation (EC) No 1592/2002 article 56.2 reads: "During an additional transition period of 42 months from the date referred to in paragraph 1, Member States may continue to issue certificates and approvals by way of derogation from the provisions of Articles 5, 6, 9 and 15 under the conditions specified by the Commission in the implementing rules adopted for their application....." The time aspect is a general problem that has to be addressed. The time given for consultation have been too short considering that the material is extensive and that acceptable means of compliance (AMC) and guidance material (GM), as well as the proposed implementing rules need more review before they can be considered ready for adoption. The entry into force dates in general does not allow neither authorities nor the market enough time to adjust. This can have serious effects on the industry and certain activities may have to shut down. We cannot accept this to happen because enough time is not allowed and this could definitely not have been the purpose. We therefore recommend that the 42 month transition period is used to give everyone involved reasonable time to adjust and prepare.	The transitional aspects are addressed in the Commission Regulation. Once it is published, the associated AMC supporting it also need to be published. The AMC are Agency documents and can therefore be amended through a process deferring for the EU decision making process.
	No text changed.

Comment	Response
Cmt. 34 / ASA Sweden	
<p>Documents in general need an editorial review in regard of language and consistency, for example:</p> <p>The titles of the drafted material should have the same structure. There is total inconsistency in whether the titles of the drafted material (in this case both the Implementation Rules and the Acceptable Means of Compliance and Guidance Material) shall be written with or without the "-" between the word "Part" and the specific letter or number of each part, i.e. M, 66, 145 or 147.</p> <p>All AMC or GM paragraph numbers should have the same structure. At present they are different in different Parts. GMs to Part 145 are called "GM (a paragraph)", see for example GM 145.A.70 (a), whereas GMs to Part 147 are called "Guidance to (a paragraph)", see example Guidance to 147.A.1.</p> <p>All AMC and GM headings should be the same as those of the requirements that they are referring to. In the drafted material, there are AMCs and GMs with a different heading than the requirement that they refer to. For example, some AMCs contain headings that have been shortened (see AMC M.A. 606).</p> <p>Regarding appendices, the following should apply:</p> <ul style="list-style-type: none"> - Appendices should be avoided. Forms and such should be inserted under an AMC or a GM. - If it is necessary to use appendices, there should be a reference in an AMC or a GM to an appendix that can be found in the material. Frequently, there are appendices attached to the material where no reference can be found in the AMCs or GMs. - In the heading of all appendices, and preferably on all pages included in an appendix, it should be clearly indicated that the appendix or page forms part of an AMC (see for example both appendices, Appendix 1 and Appendix 2, to AMC and GM to Part 145, where nothing indicates that their provisions contain acceptable means of compliance). - In order to provide acceptable means of compliance or guidance material that is easy to recognise for all users, all forms should retain their original numbers. - It is also preferable that all relevant forms which have been developed by JAA are inserted in the AMC/GM-material. Thus, "Form 12" for the application of a 147-organisation approval, should be inserted in the AMC material for Part 147. 	<p>This review will be carried out by the agency as soon as a consolidated text is available for adoption.</p>

Comment	Response
OTHER	
Paragraph	
Cmt. 11 / Foca Switzerland	
Considering that the "light aircraft" case of Part 66 has no equivalent in JAR-66, AMC relating to the issue and conversion of "light aircraft" ratings respectively are judged as very poor.	No text changed.
Cmt. 31 / Martinair Holland NV	
According to the Explanatory Note some Leaflets are not incorporated into AMC or GM of AMC 66 we recommend to incorporate the following leaflets into AMC or GM to Part 66: -Leaflet 31: JAR 66 Conversion of National Licences, Authorisations and Approvals to Full JAR 66 licence. -Leaflet 32: JAR 66.60 Equivalent Safety Case Re JAR66.1 D&E Protected Rights -Leaflet 35: Protected Rights -Leaflet 36: JAR-66 Qualification paths and related experience requirements -Leaflet 39: JAR 147 IEM66.45(d) Type/Training Rates	The content of the subject TGLs has been fully reviewed, the applicable paragraph have been transferred, the rest has been left for further Agency analysis. No text changed.