



**Comment Response Document (CRD)  
to Notice of Proposed Amendment (NPA) 2007-02**

**for amending the Commission Regulation 2042/2003 of 20 November 2003 on the continuing of airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of the organisations and personnel involved in these tasks**

***'Time limit for demonstrating compliance with knowledge and experience requirements'***

## Explanatory Note

### I. General

1. The purpose of the Notice of Proposed Amendment (NPA) 2007-02 dated 19 March 2007 was to propose an amendment to Commission Regulation (EC) No 2042/2003<sup>1</sup> of 20 November 2003 laying down implementing rules for the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

### II. Consultation

2. The draft Opinion amending Commission Regulation (EC) No 2042/2003 of 20 November 2003 was published on the web site (<http://www.easa.europa.eu>) on 20 March 2007.

By the closing date of 21 June 2007, the European Aviation Safety Agency (the Agency) had received 196 comments from 55 National Aviation Authorities, professional organisations and private companies.

### III. Justification for introduced changes

3. NPA 2007-02 proposed the following key points:

All basic knowledge modules (except modules 1, 2, 3 and 4 and those already completed as part of another category/sub-category already endorsed) must have been passed within the 7 years preceding the application for an Aircraft Maintenance licence (AML).

The basic experience requirements must also have been completed within the 7 years preceding the AML application.

Examination credits for basic knowledge requirements are only granted for technical qualifications gained within the 7 years preceding the AML application.

Type Training must have started and finished within the 3 years preceding the application for endorsement on the AML. The same process applies to Type Examination.

For type examination, after the first and second attempts a 90 day waiting period is required prior to the next attempt.

After 3 attempts for a specific basic module or for a type examination, a 1 year waiting period (for self-starters) or 2 year waiting period (for those attending a Part-147 course) is required prior to the next attempt.

The presence of 2 examiners is required during any type examination, where type training is not required.

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<sup>1</sup> Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks, *OJ L 315, 28.11.2003, p. 1*. Regulation as last amended by Regulation (EC) No 376/2007 (*OJ L 94, 4.4.2007, p. 18*).

The documentation supporting that all the requirements have been met for the AML application must be available at the time of the application.

Incorporation in EASA Form 19 (Appendix V) of statements where the applicant confirms that he/she has met the knowledge and experience requirements of Part-66.

4. In view of the comments received during the external consultation phase of the NPA, the following considerations have been made, and the proposed text has been revised accordingly:
5. The 7 year period for completion of basic knowledge and basic experience was considered too short by many commentators, taking into account several factors such as military service, difficulty for studying and working at the same time, situations of long term illness / injury (in some cases produced at work), etc.

The new proposal has increased the period from 7 years to 10 years. This 10 year period is in line with the current regulation where an applicant who is not working and studying at the same time has:

- 5 years to pass the basic knowledge examination (Appendix II, item 1.11)
- A maximum of 5 years experience required per 66.A.30

The improvement with respect to the current system is that the experience can not be spread over an unlimited period of time before applying for the licence. Therefore a new paragraph 66.A.30 (f) has been added, stating that the required experience shall have been started and completed within the 10 years preceding the application for an aircraft maintenance licence, thus extending the allowable timeframe from 7 to 10 years.

Conversely, it would not have made sense to go beyond 10 years for the required experience as the level of basic knowledge would diminish too much after such a long period without recent practice; experience spread over too much time will no longer act as a compensating factor in order to sufficiently maintain the required levels of knowledge. Experience when gained during the last 10 years, constitutes a safety net.

6. The 7 year validity for the basic knowledge modules was justified by the fact that the basic knowledge requirements in Part-66 are subject to constant evolution. Modules 1, 2, 3 and 4 were excluded from this time limit because they are of a general nature and are not expected to change over time.

However, military organisations that have decided to implement Part-147 training as part of their requirements (in line with Basic Regulation EC No 1592/2002<sup>2</sup>) would face difficulties in retaining their personnel (those not holding a Part-66 licence) because they will be forced to leave the military before the end of the 7 year period in order to gain the necessary experience in civil aviation maintenance. These organisations may even choose not to follow Part-147 as part of their training, which is not in line with the objectives of the Basic Regulation EC No 1592/2002.

In addition, the reason behind the 7 year validity period should not be that the applicant for an AML has forgotten his or her basic training but the fact that there are modules that are subject to constant evolution. The level of knowledge that may vanish over time is not in question; otherwise the same problem would have existed for a

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<sup>2</sup> Regulation (EC) No 1592/2002 of the European Parliament and of the Council of 15 July 2002 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency. *OJ L 240, 7.9.2002, p. 1*. Regulation as last amended by Regulation (EC) No 334/2007 (*OJ L 88, 29.3.2007, p. 39*).

qualification, a diploma, etc. Only the evolution of the syllabus, as described in Appendix I of Part 66, is taken into consideration.

7. As a consequence, the new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to allow the competent authority to evaluate whether Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed. Some modules or sub-modules or items may need to be repeated if they have become amended in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b), where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).
8. As a consequence of the previous paragraph, there is no longer a need to consider whether a module is likely, or unlikely, to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been removed from the NPA, because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred.
9. In addition, to aid consistency, all examination and module credits without exception will now expire after 10 years and shall be reviewed under the new process as described in Part 66.A.25. (b). Therefore a new paragraph 66.B.410 has been created for examination credit validity.
10. For the same reasons as described in paragraphs 6 and 7, a similar provision in 66.A.25 (b) has been considered for the grant of examination credits for other technical qualifications. All examination credits granted will become invalid after 10 years. However, the applicant can re-apply for credits on the basis of a new comparison between their original training and the current Part-66 Appendix I.

These changes mean that the revision of the corresponding examination credit reports produced by the Competent Authority (as required in 66.B.405(d)) should be carried out not only when the national qualification standard has changed, but also when Part-66 Appendix I has changed. Paragraph 66.B.405 (d) has been revised accordingly.

As a consequence, a candidate must formally apply to the Competent Authority for examination credits, (regardless of whether previously obtained Part-66 Appendix I modules have expired, or for other technical qualifications). The candidate must receive written confirmation from the Competent Authority of any credits granted at that time, which will be valid for 10 years from this date, after which a new request for credits and a new comparison will be necessary.

Although 66.A.10(b) already requires that the formal application for a licence must include all the supporting documentation which confirms that all requirements have been met, including the examination of those modules that have not received a credit; GM 66.A.25(b) has been created to further clarify the validity of basic knowledge examinations and credits.

11. Relevant record keeping requirements have been extended to at least 10 years, in order to fit the new validity, either for Part 66 or Part 147.
12. For type examination where type training is not required, the waiting period after the first attempt has been reduced to 30 days and after the second attempt to 60 days. The initial proposal of 90 days was found to be excessive, and the new waiting periods proposed should be enough for the organisation providing the examinations to

reschedule them, whilst at the same time allowing the candidate sufficient time to revise the failed subjects.

13. The waiting period after 3 attempts for a specific basic module, or for type examination, has been standardised to 1 year, regardless of whether it is a self-starter or someone attending Part-147 training. After that 1 year period, a new set of 3 attempts can be undertaken.

When applying for an examination, the applicant shall confirm in writing to the organisation appropriately approved under Part-147 or the competent authority, the number, dates and examining organisation of any attempts during the previous 12 months. The organisation appropriately approved under Part-147 or the competent authority is responsible for checking the number of attempts within the applicable timeframes.

Where type training is not required, the presence of 2 examiners during type examination has been abandoned due to lack of competent personnel, especially amongst the competent authorities. Nevertheless, it is a requirement that the examiner shall not have been involved in the candidate's training.

14. In addition, some comments were received expressing the view that the validity of a diploma such as a University certificate has no expiration and therefore, for the same reasons, the basic module examinations and basic experience should not expire, regardless of when the application for an AML is made.

This comparison is not adequate; a diploma is only comparable with the Part 66 licence itself and not with separate modules. A Part 66 module is only part of the course to be passed. Having passed all the relevant modules in the (sub) category sought, it is the Part 66 licence, including experience, which acts as a document attesting to the qualification gained within the timeframe as a whole. In this case, the Part-66 licence does not expire, (is only subject to an administrative renewal).

15. The previous proposal regarding changes to Form 19 has been abandoned; there was no additional value in the applicant confirming that knowledge and experience requirements have been met; all justifications will have to be satisfactorily documented and shown when the application for the licence (or for the type training endorsement) is submitted to the NAA.
16. Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

17. Note that this CRD to NPA 2007-02 was initially published on the EASA website on 4th October 2007. However, one member of the rulemaking group complained that EASA made some changes to the CRD during the review of the comments without having properly informed. The complaint was accepted by the Agency for fairness and transparency.

One week later, the CRD was withdrawn from the EASA website and on 9/10 January 2008, all the members of the drafting group and two additional members (one from the EASA standardisation department and one external from the industry) were invited to review the document. During that meeting, no major changes were brought to the initial CRD and its concept, although some improvements were carried out for better clarity, understanding and justifications in Part 66.A.25, Part 66.B.405, Part 66.B.410 (new) and GM 66.A.25 (b) (new) about the examination credit, the validity of the modules as well as the validity of the examination credit.

#### IV. Publication of the CRD

18. All comments received have been acknowledged and incorporated into this Comment Response Document (CRD) with the responses of the Agency.
19. In responding to comments, a standard terminology has been applied to attest the Agency's acceptance of the comment. This terminology is as follows:
- **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
  - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
  - **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
  - **Not Accepted** - The comment or proposed amendment is not shared by the Agency

The resulting text highlights the changes as compared to the current rule.

20. The Agency's Decision will be issued at least two months after the publication of this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.

Such reactions should be received by the Agency not later than **01 June 2008** and should be submitted using the Comment-Response Tool at <http://hub.easa.europa.eu/crt>.

#### IV. CRD table of comments, responses and resulting text

##### (General Comments)

comment	<p>24 <span style="float: right;">comment by: <i>TYROLEAN AIRWAYS</i></span></p> <p>1) We are questioning the introduction of a time limit for the "Basic Knowledge modules" in general, because it is in contradiction to many national education systems where basic education exams and certificates do not expire at all like: final apprentice certificates, school leaving examinations, college diplomas, university degrees, etc.</p> <p>2) For justification of introducing a time limit pls provide a safety + benefit analysis in comparison to the present national systems</p>
response	<p><i>Partially accepted</i></p> <p>Refer to the explanatory notes of both NPA and CRD</p> <p>1) see CRD, Explanatory note, paragraph 14          "Some comments were received expressing that the validity of a diploma such as a University certificate has no expiration and therefore, for the same reasons, the basic module examinations and basic experience should not expire, regardless of when the application for an AML is made. This comparison is not adequate: only a diploma is comparable with the Part 66 licence itself and not with separate modules Having passed all the relevant modules in the (sub) category sought can only be sanctioned by a Part 66 licence (including experience) which acts as a document attesting the qualification gained in a timeframe as a whole. In this case, the Part-66 licence does not expire (is only subject to an administrative renewal).          A Part 66 module is only part of the course to be passed.</p> <p>2) It makes sense that compliance with basic knowledge and experience should be within a timeframe before applying to a licence or for a type rating and this is why some NAAs were of opinion that a time limit should be introduced in Part 66. ; for more details, refer to the RIA as proposed in the NPA, paragraph 19.</p> <p>3) The new proposal gives flexibility as after a 10 year validity, the validity of an basic knowledge examination will be reconsidered through the examination credit process (refer to 66.A.25 and 66.B.405).</p>
comment	<p>28 <span style="float: right;">comment by: <i>Benjamin KIRBY</i></span></p> <p>I wish to voice a concern over the proposal to limit the number of exam attempts by prospective Part 66 AML holders to 3 attempts before a mandatory 12 month waiting period before the candidate may retake a Module exam having failed to pass the exam in those attempts. Specifically the content of the Draft Opinion section IV, Para 14 point 7, and Draft Opinions Part 66 Appendix 2 Para b 1.13. My comments and justification are as follows:          I feel that this step is unnecessary, unfair, and unjustified for the safe training and qualification of competent Licensed Technicians. I am particularly against this proposal in regard to those candidates who repeatedly fail to pass Module Exams for Module 11 and 13, the enormous possible subject matter covered in these modules makes it highly likely that several attempts will be required by the majority of candidates to pass this exam. Many candidates, (certainly those who choose the self study while working within the industry path), will take an exam before refining the direction of their studies, purely to get a feel for the</p>

questions and the range of the required knowledge. This will normally result in the first failed attempt. For many in the industry a license is a means of career progression. Preventing repeated 'failers' from taking exams for an entire year having already restricted them to a three month wait between re-sits will no doubt result in a further reduction in an already understaffed skilled workforce and have a detrimental affect on aviation safety.

Part of your justification is that "*Maximum "three attempts" rule is consistent with some Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003*" If this is the case then there must be Member States where there was not this rule. In looking to improve the licensing systems in your consultations can you not be justified in following the Member States with the less restrictive ruling?

You also state as justification that; "*It is commonly accepted that three consecutive failed attempts questions the ability of the trainee to pass exams and to succeed in this field.*" This maybe a valid point for those attending a full time academic, 'Ab-Initio', training course, but in the case of Mechanics and Technicians already holding positions and qualifications within the Industry to question a person's abilities to fulfil the duties and privileges of an AML holder on the basis that they failed to pass a difficult and complex exam is not correct. Furthermore to base the requirements for Maintenance personnel training and qualifications on the philosophy and criteria of Flight Crew [Para 15 ..."*These new limitations are consistent with the philosophy and the existing criteria as proposed by JAR-FCL 1(§1.490 "pass standards" and §1.495 "acceptance period"*), may cause failings in achieving the required standards for a very different professional discipline.

(These comments are my own personal views and not as a representative of any other person, body, or organization).

response *Not accepted*

This new proposed rule gives the applicant a ten year period to pass every module and gain experience: with a one year waiting period after every set of 3 failed attempts, the applicant will have the possibility to sit for examination at least 18 times in the ten year period, which is reasonably generous.

comment 30

comment by: *Juan Ramon MATEOS CASADO*

Basic theoretical knowledge is supported by a Certificate of Recognition issued by the approved basic training organization. The validity of such certificate should be unlimited in the same way that is the Certificate of Recognition issued by any other vocational school or the Degree Certificate given by any university, according to the Educational System for the most of European Countries.

Application of these time limits to students of Part 147 schools may be denounced as a clear case of inequality and may be prosecuted by States laws.

response *Not accepted*

Refer to the explanatory note of this CRD, paragraph 14

"Some comments were received expressing that the validity of a diploma such as a University certificate has no expiration and therefore, for the same reasons, the basic module examinations and basic experience should not expire, regardless of when the application for an AML is made. This comparison is not adequate: only a diploma is comparable with the Part 66 licence itself and not with separate modules Having passed all the relevant modules in the (sub) category sought can only be sanctioned by a Part 66 licence (including

experience) which acts as a document attesting the qualification gained in a timeframe as a whole. In this case, the Part-66 licence does not expire (is only subject to an administrative renewal).

A Part 66 module is only part of the course to be passed

comment

40

comment by: *Tactical Air Command Denmark (TACDEN)*

1. Royal Danish Air Force (RDAF) Tactical Air Command Denmark (TACDEN) has following general comments on the Notice of Proposed Amendments (NPA) 2007-02, regarding a time limit for demonstrating compliance with knowledge and experience requirements.

2. It is for the time being not possible to issue a civilian type certificate and Aircraft Maintenance License (AML) whilst working on military aircraft in Denmark. The proposed amendment will imply that the basic training modules of RDAF military aircraft technicians will lose their validity after seven years. As a result of this RDAF will experience recruitment and adherence difficulties, and it will have consequences for the Defence documentation living up to national and international aviation safety regulations.

3. TACDEN suggests that the basic training modules are excepted for "the seven year validity period", provided that the applicant for an AML certificate can document continuous and representative maintenance experience and practical maintenance in military or other governmental aviation activities in accordance with NPA 2007-04, Re-issuance of the Part-66 Aircraft Maintenance License, and Part 66 AMC Appendix II .

response

*Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 and 7 where provisions have been added for military organisations, willing to implement EC n°1592/2002.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

107

comment by: *SAMA Swiss Aircraft Maintenance Association*

SAMA supports the proposed approach to amend EC 2042/2003 in line with option 2, although no cases are known where the existing 5 years validity for basic module examinations and no apparent limit for practical training has led to inappropriate issue or denial of a licence.

Justification:

In practice, no employer would really support and pay for a basic formation that lasts more than five or even seven years until the person may be integrated in a productive process. The same is true for type trainings/ratings: there is no point in training a person for any specific type if there is not an

response	<p>imminent need for such a qualification.</p> <p>We do not believe that there is a noteworthy safety concern in this issue.</p> <p><i>Noted</i></p>
comment	<p>123 comment by: <i>Norwegian Royal Airforce Training Centre Kjevik</i></p> <p><b><u>1 Background</u></b></p> <p>The Royal Norwegian Air force Training Centre Kjevik (AFTCK) is a Part 147 organization approved by the Norwegian Authority (NO.147.0008).</p> <p>From our interpretation of Regulation (EC) No 1592/2002 the member states shall ensure that military services have due regard as far as practical to the regulations. The AFTCK approach to this has been to become an approved Part 147 organization.</p> <p>EASA has notified changes to the Part 66 according to NPA 2007-02, and we want to detail our justification comment to this NPA.</p> <p><b><u>2 Discussion</u></b></p> <p>One of the proposed changes in the NPA is to implement a 7 year time limit from the exam of the first module to AML is obtained. This to improve safety, by preventing applications based upon qualifications achieved 25 years earlier.</p> <p>The intention of the NPA is absolutely an improvement of the current regulation. However we are not sure that the entire impact of the proposed changes constitutes an improvement for all categories of personnel.</p> <p>The AFTCK main objective is to provide military technicians with a fully approved basic education. This is beneficial to the involved personnel, the military organization and the international aviation community.</p> <p>If EASA implements the 7 year rule in accordance to the proposed changes to Part 66 <u>all</u> our technicians must leave the force a few years after basic training, seeking civil aircraft experience if they are to obtain the AML. This will drain the military organization to such an extent that it can not be tolerated. The consequences will be:</p> <p style="padding-left: 40px;">Termination of AFTCK approved Part 147 education. Nor can we believe that any other military organization can provide approved 147 educations under such conditions.</p> <p style="padding-left: 40px;">The air force maintenance organizations may no longer regard applicants from the civil Part 147 basic organization as future employees, as they will have to leave the force after a few years to gain their required civil aircraft experience.</p> <p>The forwarded comment adds a sentence to the already proposed text. The AFTCK proposed change is not meant to reduce the requirement of the civil aircraft maintenance practice according to Part 66.A.30(e). The intention is to avoid the invalidation of the modules as long as the applicants gain an uninterrupted operative aircraft maintenance experience.</p> <p><b><u>3 Conclusion</u></b></p> <p>To avoid a devastating effect for the military education system fully compliant to EASA regulation, we see it necessary to change the proposed text according to the forwarded comment form.</p>
response	<p><i>Partially accepted</i></p>

Refer to the explanatory note of the CRD, sub-paragraphs 6 and 7 where provisions have been added for military organisations, willing to implement EC n°1592/2002.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment *135* comment by: *FAA*

The FAA has reviewed the subject NPA and has no comments.

response *Noted*

comment *189* comment by: *Emmett GAVIN*

I broadly agree with the proposed amendment with the exception of the 1 year time bar for 3 consecutive failures of the same module. Whilst it may seem appropriate for some modules, certain others notably 13 & 11 are very extensive subjects with high failure rates. Persons like myself who cannot take time out to study full time make up a huge number of engineers in the UK who are either removing restrictions or extending coverage, this is being forced upon us by changing employment trends in the industry. The last thing we & the industry needs now are further hurdles in the form of time bars.

In my opinion anyone who can pass module 13 deserves that pass. The number of times attempted is a measure only of an individual's determination to succeed and in no way reflects the possible outcome of the next exam.

response *Not accepted*

This new proposed rule gives the applicant a ten year period to pass every module and gain experience: with a one year waiting period after every set of 3 failed attempts, the applicant will have the possibility to sit for examination at least 18 times in the ten year period, which is reasonably generous.

resulting text Refer to the resulting text at the end of the document, last comment (or last segment)

## A. EXPLANATORY NOTE

p. 3

comment *140* comment by: *CAA-NL*

Comment to Explanatory note:

At different places in the analysis it is suggested that changes are in line with pre-Part-66 national systems.

This however does not apply to the Netherlands. The national licensing system (small aircraft only) had a three-year validity of the school certificate and a two-year period for demonstration of experience.

It is true that failing three consecutive attempts does indicate that applicant has difficulty in meeting the criteria, but passing an exam demonstrates that the criteria are met; even a fourth or fifth attempt.

The statement that Module 1, 2, 3 and 4 change very little is not the right argument to have unlimited validity. It would be better to justify the unlimited validity of module 1, 2, 3 and 4 by the general character of the knowledge and the indirect support of it to basic knowledge directly related to the systems and activities. It further extends to the type training where actual up to date knowledge is required, which supports a shorter validity (two or three years).

response *Noted*

comment *141*

comment by: *CAA-NL*

General comments (without proposed alternative text)

1. Credits for modules that are common between old and new categories **should expire** when working outside the old categories.

2. Validity of modules and Credits for modules common in categories, **should not expire** when working in a relevant environment, such as engineering, aircraft manufacturing, military aviation, component maintenance or production.

Justification:

1. Knowledge of module 5 to 17 will fade away and become outdated if it is not used. That, probably, is the main reason to limit the validity of the exams. Having obtained an AML in itself does not guarantee that the knowledge will stay up to date. And even keeping the AML valid does not guarantee this. Only when knowledge is used, it will (to a certain extend) be kept up to date.

2. On the other hand, working in an environment where knowledge of module 5 to 7 is required and used will help a lot to keep the knowledge up to date. Ideally this environment covers civil aircraft maintenance in the right category, however it is very well possible to maintain similar knowledge and skills in other environments, such as aircraft engineering, aircraft manufacturing, military aviation, engine or component maintenance or production. In order to be able to get sufficient qualified technicians in the future it is in our countries very important to facilitate people with the right knowledge and skills to join the civil aircraft maintenance industry. Limiting the validity of the module exams without a clause to maintain its validity, in e.g. military service, will dramatically reduce the possibilities to switch to civil aircraft maintenance.

response *Noted*

resulting text Refer to the resulting text at the end of the document, last comment (or last segment)

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<b>A. Explanatory Note - IV. Content of the draft opinion</b>	p. 4-8
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comment

1

comment by: *Air Berlin*

Paragraph 10. says "It is **felt** that an applicant that spends too much time to obtain a licence has difficulties with the knowledge/experience requirements.". It is our opinion that, firstly, regulatory rules should not be developed and/or amended based on feelings, but rather based on facts. Secondly, "difficulties with the knowledge/experience requirements" are only one possible cause for an applicant spending "**too** much time to obtain a licence". Especially social causes, such as long-term sickness (including working accidents!), family issues (raising of children, care for other family members requiring assistance etc.) as well as financial problems of those having to pay for their licence on their own - to mention only some - have obviously been completely neglected as causes for applicants not meeting a specific time frame.

response

*Noted*

A 10 year validity as newly proposed, gives a lot of flexibility in order to cover most of the cases.  
Refer to the explanatory note of this current CRD, sub-paragraph 5.

comment

2

comment by: *Air Berlin*

The 3rd point of paragraph 13. states "Therefore, there is a need to limit the time allowed for the applicant to comply with the knowledge and experience requirements and apply for a licence.". The concern, that an applicant could gain experience and apply for a licence 25 years after his basic training, is no justification for that. First of all, it might well be that an applicant passed his basic/vocational training and then had 25 years of experience in aircraft maintenance without needing a licence (for example, in base maintenance). In such a case, this person would be treated like being untrained, which is unacceptable. As no comparable rule is known to us in any other professional branch, where a vocational training or parts of it would "expire" just over time, this should not be introduced in aviation. After all, aviation already is a branch which is widely known for the high level of education of its employees, and there is no need to further raise the requirements by adding additional time limits.

response

*Not accepted*

The comment is not in line with PART 145.A.30(h): "Any organisation maintaining aircraft, except where stated otherwise in paragraph (j) shall:  
1. in the case of base maintenance of large aircraft, have appropriate aircraft type rated certifying staff qualified as category C in accordance with Part-66 and 145.A.35. In addition the organisation shall have sufficient aircraft type rated staff qualified as category B1 and B2 in accordance with Part-66 and 145.A.35 to support the category C certifying staff.  
(i) B1 and B2 support staff shall ensure that all relevant tasks or inspections have been carried out to the required standard before the category C certifying staff issues the certificate of release to service.  
(ii) The organisation shall maintain a register of any such B1 and B2 support staff.

2. in the case of base maintenance of aircraft other than large aircraft have either:

(i) appropriate aircraft type rated certifying staff qualified as category B1 and B2 in accordance with Part-66 and 145.A.35 or,

(ii) appropriate aircraft type rated certifying staff qualified in category C assisted by B1 and B2 support staff as specified in paragraph (1)."

Therefore, in base maintenance, support staff should be Part-66 rated. The agency understands that some people may work under the supervision of licensed people having a licence. But it is quite unusual a person having passed the basic training and having worked for 25 years in the maintenance field under the supervision of a B1/B2 without seeking the Part 66 licence. This person should seek the licence.

comment

3

comment by: *Air Berlin*

The 1st point of paragraph 14 bears a logical error. How can a person present a complete set of application documents without specifically knowing what the NAA will credit? As any credit must officially be approved and confirmed by the authority **before** the applicant can determine his required scope of additional basic training, the application must be made before training and examination is being started. The **authority** must state the required scope of training for each individual applicant! The risk of maybe taking (and paying!) a training/examination which might not be needed and instead not doing another one which is needed (maybe even with resulting in not meeting the overall 7 year time frame due to this confusion and subsequently losing **everything**) cannot be put upon the shoulders of the individual applicant.

response

*Accepted*

Refer to the explanatory note of the CRD, sub-paragraph 10 where such provisions have been added.

The changes introduced by the CRD mean that the revision of the corresponding examination credit reports produced by the Competent Authority (as required in 66.B.405(d)) should be performed not only when the national qualification standard has changed, but also when Part-66 Appendix I has changed. Paragraph 66.B.405 (d) has been revised accordingly. As a consequence, a candidate must formally apply to the Competent Authority for examination credits (regardless of whether previously obtained Part-66 Appendix I modules have expired or for other technical qualifications). The candidate must receive written confirmation from the Competent Authority of any credits granted at that time, which will be valid for 10 years from this date, after which a new request for credits and a new comparison will be necessary.

GM 66.A.25(b) has been created in order to recommend the applicant to ensure that he demonstrates compliance with the knowledge requirements within the ten years preceding the application for an aircraft maintenance licence. It is the applicant's best interest to comply with this requirement as his application may be rejected if based on expired examination credits or expired module examinations: in such a case, the examination credits will have to be re-assessed due to technology evolution, regulation changes etc.

comment

4

comment by: *Air Berlin*

The 2nd point of paragraph 14 suggests to invalidate basic training modules

passed longer than 7 years prior to the application for a licence. In our opinion, there is no justification for declaring **any** kind of passed examination invalid just because of the time which has passed since then. This should only be done if a module's **content** has changed dramatically. Even then, a **partial** re-training or an **additional** examination in selected (sub-)modules should rather be considered than starting **everything** from the beginning. Anything else would not be justified by facts but just bureaucracy (or a subsidy programme for Part-147 organisations). But as most modules are - literally - **basic**, we expect no dramatic changes in their contents even over 25 year (the theory of flight will probably stay the same for another couple of years). After all, when a person finally got the licence, there is no discussion about the question whether this person has current basic knowledge anymore anyway, even if the training **indeed** was 25 years ago! Finally, according to our interpretation, invalidating of passed examinations after a certain time also dramatically contravenes with some very basic rights of European citizens, such as the right to keep a profession or the ban on discrimination (equality principle).

response *Accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to be fully in line with the nature of this comment.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment 5

comment by: *Air Berlin*

The 2nd point of paragraph 14 states "On the other hand self starters would be obtaining their experience in parallel to their learning programme and so in effect have the full 7 years to meet the requirements.". Especially for this stated group of persons, but also for those undergoing an "approved B1/B2 training standard", the portion of time being left for learning and preparation for the examination is too short. A self-starter has to gain 5 years of experience and then there are only 2 years left for passing all basic exams as well as the type rating course (where there will still be the necessity to make a living, in other words: to work, and working in the aviation industry is often marked by working at night, overtime, or at places other than you live, which will make a proper preparation for an exam particularly difficult). If any regulation should be found to define a maximum period for showing basic training, experience plus type rating, this should be much longer. But by far the better approach would be to define a maximum period between completion of experience, basic training and type rating. This would on the one hand require the applicant to work on his licence continuously, but would leave the freedom to put more emphasis on personal or duty matters for a specific time. This would mean that somebody would have to show continuous effort and progress, which would meet the intention of this NPA equally. Additionally, the negative effects of social impacts such as sudden unemployment would be

	<p>less.</p> <p>Finally, it should also be possible for applicants to apply for an extension of the allowed time frame. This should not only be restricted to "important" causes like long-term sickness, family issues etc., but also other reasons, such as - simply a lack of money (it must be possible to prove that by a simple statement without an undue amount of bureaucracy).</p>
response	<p><i>Accepted</i></p> <p>Refer to the explanatory note of the CRD, sub-paragraph n°5 where the 7 years period, as previously proposed, has been extended to ten years. Refer also to comments n°3 and 4.</p>
comment	<p>6 <span style="float: right;">comment by: <i>Air Berlin</i></span></p> <p>The 2nd point of paragraph 14 is finalized by the statement, that a seven-year validity of basic training would ensure a good level of safety and would be consistent with Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003. As already stated, the safety benefit of a seven-year validity is just a statement without any justification. There is no proof that a person whose basic training was completed more than seven years ago works less safe than others. It is also a logical error compared to those who acquire their licence within seven years, because afterwards basic training is not questioned anymore. It is also completely omitting for example the safety benefit of long-term experience and personal maturity especially of older people and therefore can also be regarded as being a discrimination in itself. Consistency with Member State systems in place prior to the JAA is irrelevant. Creating a level playing field should not mean that 27+4 countries have to adopt the hardest rules in place in one of those countries before. Instead, there should be a good compromise and also consistency especially with the JAA-system.</p>
response	<p><i>Not accepted</i></p> <p>The reasons for introducing a time limit for demonstrating compliance with knowledge and experience are explained in subparagraph n°14 of part IV in the explanatory note of this NPA.</p> <p>It is stressed out again in sub-paragraph 5 of this current CRD.</p> <p>According to sub-paragraph 14 of this CRD, once the licence is granted, there is no reason to question the basic knowledge, like for a diploma. Only a diploma is comparable with the Part 66 licence itself and not with separate modules. Having passed all the relevant modules in the (sub) category sought can only be sanctioned by a Part 66 licence (including experience) which acts as a document attesting the qualification gained in a timeframe as a whole. In this case, the Part-66 licence does not expire (is only subject to an administrative renewal). A Part 66 module is only part of the course to be passed.</p>
comment	<p>7 <span style="float: right;">comment by: <i>Air Berlin</i></span></p> <p>The 3rd point of paragraph 14 suggests to give an unlimited validity to modules 1 to 4, because their contents is unlikely to change. The idea to exclude some modules from being declared invalid because they will not be</p>

subject to change, is good. But the most parts of all the other modules will also not change dramatically over time - after all, this is **basic** training! Furthermore, before the content of training courses and examinations could be changed, a change of the syllabus dictated by Appendix I of Part-66 would be necessary. This had not been the case so far, and we do not expect this to happen very frequently. Even if there would be changes in a higher frequency than one in seven years, when declaring passed examinations in a certain module invalid, it should be observed if there indeed were changes in that specific module and if they were so important that a complete retaking of the training/examination would be necessary or if delta-training/-examination might be sufficient.

When taking a closer look at all the modules one will find out that there is hardly any module which might change so drastically by "constant evolution" to justify an invalidation after seven years. Instead, it must be considered **if** there were indeed any changes. Anything else would be purely bureaucratic and would not have any safety benefit, but bears only disadvantages for organisations and individuals. More modules should be declared to not expire at all, and for the rest there should only be a requirement to check for changes if they are "older" than a certain amount of time (which should in any case be longer than seven years). If changes **are** being detected, a delta-training/-examination in the specific module should rather be considered than a cross-the-board invalidation of single complete or even all modules.

response

*Accepted*

Refer to comments n°3 and 4 made by your organisation.

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to be fully in line with the nature of this comment.

Refer to the resulting text (last comment)

In addition, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred.

comment

8

comment by: *Air Berlin*

The 4th point of paragraph 14 suggests to extend the seven-year validity of passed module examinations also to "technical qualifications" which might be credited. This is completely unacceptable. First of all, this would be a contradiction to basic rights of European citizens. A technical qualification once gained may not be taken away and therefore must be credited as long as a person is alive. Anything else would be discrimination.

Such a rule could for example lead to the crazy situation that for example a person who passed an apprenticeship as an aircraft mechanic 10 years ago, then continuously worked in an engine shop and now - for personal or company reasons - has to or wants to change to the line maintenance, must take the same training and examination like a school leaver! Such a person would even be considered to have zero knowledge in engines! Another example might be a graduated engineer with a university degree who worked in an engineering environment for 15 years, and then decides to acquire an aircraft maintenance licence. This graduated engineer would also be treated like an 18-year old school leaver, although having very high basic as well as

type knowledge, kept up by continuous experience. Such ridiculous cases would count by the thousands in Europe if the idea to limit creditation of technical qualifications to seven years would be made true. It would also "close the door" for career changers from other technical branches, such as automotive, where traditionally a large number of maintenance staff is being recruited. With this new regulation, a car mechanic (if the apprenticeship was finished more than seven years ago) would need to take the same training/examination to gain a licence like a hairdresser or, again, a school leaver. Therefore, also the crisis in availability of skilled maintenance personnel would artificially be made worse. This would in any case contravene with the tasks of EASA.

response *Partially accepted*

Refer to the explanatory note of this CRD, sub-paragraph 9 where provisions in order to be in with the nature of this comment have been added.  
Refer to answers n°3, 4 and 7.

comment 9

comment by: *Air Berlin*

The 5th point of paragraph 14 suggests a three-year validity for type training and examinations. This period is unacceptable because it is by far too short. It should not be less than 5 years and contain a "continuous experience"-clause (including **similar** aircraft types) as well as the possibility to "re-fresh" type rating courses. In our opinion, it does not matter that a course certificate is 25 years old if the applicant continuously worked on the aircraft type (or a similar type) for those 25 years! This would even **contribute** to safety because of the benefit of experience, which is being completely neglected throughout the whole NPA document. Even if there was no continuous experience, we consider the Part-147 type training/examination to be intense enough to both have a longer validity than only 3 years as well as bearing the possibility to "re-fresh" the knowledge by a shortened course/examination if type training was "too" long ago.

response *Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame (for example, refer to comments n'113 and 168).

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

Additionally, somebody having passed the type training examination and getting continuously experience on the aircraft type should seek the endorsement of the aircraft type on the Part-66 licence.

comment 10

comment by: *Air Berlin*

The 5th point of paragraph 14 is finalized by the statement, that a three-year validity of a type rating would ensure a good level of safety and would be

consistent with Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003. As already stated, the safety benefit of a three-year validity is just a statement without any justification. There is no proof that a person whose type training was completed more than three years ago works less safe than others. It is also a logical error compared to those who acquire their licence within three years, because afterwards type training is not questioned anymore for all times. It is also completely omitting for example the unquestioned safety benefit of long-term type experience. We even claim that a three-year validity of type ratings is counterproductive and leads to a **lower** standard of safety because when this rule would be set into force, comprehensive and approved type rating courses might only be conducted for those preparing to gain a licence within the next 3 years. Those skilled workers, for example in base maintenance, who do not or not yet need a licence, might not or not as early as nowadays receive type training of high quality, but none or shortened/unapproved training. The number of staff working on aircraft without any or with only low aircraft type knowledge would increase, in fact **lowering** the achieved safety standards. Also, the more experienced older persons (whose type rating courses date back too long) would have lesser chances to get a licence than the unexperienced younger ones by this rule, which is also **not** beneficial for safety at all. Consistency with Member State systems in place prior to the JAA is irrelevant. Creating a level playing field should not mean that 27+4 countries have to adopt the hardest rules in place in one of those countries before. Instead, their should be a good compromise and also consistency especially with the JAA-system.

response *Not accepted*

See reply to comment n°9 (just above)

comment *11*

comment by: *Air Berlin*

The last point of paragraph 14 in our opinion is the one and only approach which should be used to address the problem identified by this NPA. An overall maximum number of attempts to pass an examination is by far more effective with respect to avoid people with dubious knowledge to gain a licence. In fact, this approach would also be supported by "hard facts" (a high amount of failed exams) instead of the comparably "soft" rule of modules being "outdated" over time, which by far tells much less about the real **competence** of a person.

response *Noted*

comment *12*

comment by: *Air Berlin*

The whole paragraph 15 is completely irrelevant. Flight operations and maintenance cannot be compared at all.

response *Not accepted*

JAR FCL addresses the same concern.

comment *13*

comment by: *Air Berlin*

Paragraph 16 shows a logical error by stating "Those having older

knowledge/qualifications intending to apply for a licence will still have the options to sit **a few** more exams.". As the "seven year" period is intended to invalidate everything which is older than 7 years, there would be for sure numerous persons who received credits for a technical qualification (for example university degree, passed apprenticeship, training from armed services etc.) which need to be withdrawn. Then, it would be more than likely that these persons would not just have to sit "a few more" exams, but would literally have to repeat their vocational training. And, additionally, why should a person or an organisation **pay** for "sitting a few more exams" when the syllabus did not change at all since the module was passed? To summarize, the wording "to sit a few more exams" is not too far away from cynism!  
 Finally, the statement "The safety level will be the same for every applicant." is simply **wrong**. The relatively young and unexperienced applicants would be favoured over the older and experienced ones just because of the "age" of the vocational training, which in our opinion even **endangers** safety.

response *Partially accepted*

Refer to the explanatory note of this CRD, sub-paragraph 9 where provisions to fit the nature of this comment have been added.

comment 28 ❖

comment by: *Benjamin KIRBY*

I wish to voice a concern over the proposal to limit the number of exam attempts by prospective Part 66 AML holders to 3 attempts before a mandatory 12 month waiting period before the candidate may retake a Module exam having failed to pass the exam in those attempts. Specifically the content of the Draft Opinion section IV, Para 14 point 7, and Draft Opinions Part 66 Appendix 2 Para b 1.13. My comments and justification are as follows:

I feel that this step is unnecessary, unfair, and unjustified for the safe training and qualification of competent Licensed Technicians. I am particularly against this proposal in regard to those candidates who repeatedly fail to pass Module Exams for Module 11 and 13, the enormous possible subject matter covered in these modules makes it highly likely that several attempts will be required by the majority of candidates to pass this exam. Many candidates, (certainly those who choose the self study while working within the industry path), will take an exam before refining the direction of their studies, purely to get a feel for the questions and the range of the required knowledge. This will normally result in the first failed attempt. For many in the industry a license is a means of career progression. Preventing repeated 'failers' from taking exams for an entire year having already restricted them to a three month wait between re-sits will no doubt result in a further reduction in an already understaffed skilled workforce and have a detrimental affect on aviation safety.

Part of your justification is that "*Maximum "three attempts" rule is consistent with some Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003*" If this is the case then there must be Member States where there was not this rule. In looking to improve the licensing systems in your consultations can you not be justified in following the Member States with the less restrictive ruling?

You also state as justification that; "*It is commonly accepted that three consecutive failed attempts questions the ability of the trainee to pass exams and to succeed in this field.*" This maybe a valid point for those attending a full time academic, 'Ab-Initio', training course, but in the case of Mechanics and Technicians already holding positions and qualifications within the Industry to question a person's abilities to fulfil the duties and privileges of an AML holder on the basis that they failed to pass a difficult and complex exam is not

correct. Furthermore to base the requirements for Maintenance personnel training and qualifications on the philosophy and criteria of Flight Crew [Para 15 ...] "These new limitations are consistent with the philosophy and the existing criteria as proposed by JAR-FCL 1 (§1.490 "pass standards" and §1.495 "acceptance period")", may cause failings in achieving the required standards for a very different professional discipline.

(These comments are my own personal views and not as a representative of any other person, body, or organization).

response *Not accepted*

This new proposed rule gives the applicant a ten year period to pass every module and gain experience: with a one year waiting period after every set of 3 failed attempts, the applicant will have the possibility to sit for examination at least 18 times in the ten year period, which is reasonably generous.

comment 59

comment by: *DASSAULT FALCON SERVICE*

"Granting of examination credits only against technical qualifications gained within the preceding seven year prior to the application for a licence." : In France, a lot of technicians come from Army (Air Force or Navy). But they spend generally 5 to 15 years in the Army. This amendment would mean that a technician having passed his military diploma more than 7 years ago would be obliged to pass all the PART 66 modules with no examination credits (except modules 1 to 4).

This would discourage them and could lead to a licenced technician shortage.

response *Accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 9 where provisions have been added in order to fit the nature of this comment.

comment 88

comment by: *Didier FOUCHE Sabena technics*

14., 2nd bullet point

"A seven year validity" period for a basic module in order to prevent the applicant from obtaining a basic licence, for example, a 25 years old set of passed modules for a specific Part 66 category and to give the applicant the possibility to comply with the experience requirements.....

Such limitation should not apply to person undergoing a qualification process valid in a Member state prior the date of entry into force of the Part 66 (Grand Father rights).

The amendment should clarify the scope of application of such limitation: person undergoing a qualification process prior and/or after the entry into force of the Part 66

Justification:

Prior the date of entry into force of the Part 66, depending of the company policy and the NAA policy, some persons gained basic qualifications, that did not allow them to be certifying staff according to the company procedures and/or NAA procedures in place at this time.

Those persons may not have apply for Part 66 licenses, sometime due to the fact that the NAA refused the issuance of the Part 66 for such persons. Some NAA considered that only persons with certifying staff authorization certificate

at the time of entry into force of the Part 66 might apply for a Part 66 conversion process.

Due to this fact, those individuals can have gained similar type training than certifying staff, have at least similar experience on aircraft maintenance, but didn't fully comply with NAA or company procedures applicable prior the entry into force of the regulation.

So, those individuals may apply in the future for a Part 66 AML based on the qualification process started prior the Part 66 regulation, even if started more than the 7 years of validity as required by the NPA.

Same remarks regarding the Type trainings gained prior the entry into force of the Part 66, for which those persons hold experience. With the validity of 3 years, how can they do to apply for Part 66 AML in the future.

response

*Accepted*

Refer to the explanatory note of this CRD and the new proposal as described in sub-paragraph 10 where clarity about examination credits and credit report have been added.

A provision in 66.A.25 (b) has been considered for the grant of examination credits for other technical qualifications. All examination credits granted will become invalid after 10 years. However, the applicant can re-apply for credits on the basis of a new comparison between their original training and the current Part-66 Appendix I.

The introduced changes mean that the revision of the corresponding examination credit reports produced by the Competent Authority (as required in 66.B.405(d)) should be performed not only when the national qualification standard has changed, but also when Part-66 Appendix I has changed. Paragraph 66.B.405 (d) has been revised accordingly. As a consequence, a candidate must formally apply to the Competent Authority for examination credits (regardless of whether previously obtained Part-66 Appendix I modules have expired or for other technical qualifications). The candidate must receive written confirmation from the Competent Authority of any credits granted at that time, which will be valid for 10 years from this date, after which a new request for credits and a new comparison will be necessary.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph

66.A.45(i)).

comment

89

comment by: *Didier FOUCHE Sabena technics*

14., 4th bullet point

"Granting of examination credits only against technical qualification gained within the preceding seven year period prior the application for a licence"

Is it planed to issue a cross reference table between the examination credits recognized by the UE NAA and Part 66 requirements, according to the hold education system (civil and military) in place in the several countries prior the entry into force of the part 66, or the qualification levels actually existing in these countries.

Justification:

Now, with the EASA regulation, the mechanics "market" is international and opened So, a repair station can employ persons coming from several countries.

But disparities are found on the nationals qualification organization and levels from a country to an another, and it is impossible to know exactly the qualification level of a mechanics based only on the qualification certificate issued by the country when those persons don't hold a Part 66 license.

The industries can not determine what's the gap between the examination hold and the Part 66 basic requirements.

So, actually, employment of a mechanics without Part 66 AML is difficult for a repair station of a different nationality, without sufficient knowledge of his graduate value.

To have a cross reference table showing for each country, the list of hold education certificates and the associated Part 66 modules that not comply with will help the industries to know what's training will be necessary depending of the origin country of the mechanics.

It will also help the industries to identify the technical secondary graduate of mechanics.

response

*Noted*

It is not planed to issue a cross reference table between the examination credits recognized by the Member States and Part 66 requirements.

comment

90

comment by: *Didier FOUCHE Sabena technics*

14., 4th bullet point

"Granting of examination credits only against technical qualification gained within the preceding seven year period prior the application for a licence"

In some cases, for non-civil aircraft basic qualification, persons concerned may apply for a Part 66 AML later than the 7 years period, with a high basic training level and high experience in aircraft maintenance.

So, in some cases, the 7 years period is too restrictive if the level of qualification gained and continuous experience in maintenance is ensured.

**Justification:**

Some persons may hold qualification and experience gained outside a civil aircraft maintenance environment more than 7 years before the application to a Part 66 AML.

For example, French Air Forces mechanics have the possibility to leave the army after 10 or 15 years.

The basic qualification gained is very high (for information, they are working on qualification process very close to the Part 147 modules) and those mechanics are very experienced in aircraft maintenance.

When leaving the Air Forces, they can apply for employment by repair stations, and those mechanics are very appreciated for their high level of qualification and aircraft maintenance experience.

In those cases, the qualification credits relative to their military basic training would have been obtained more than 7 years before application to the Part 66 AML, even if they have experience until leaving the army.

So, even if they pass the missing Part 66 modules, their examination credit will be gained over the 7 years required

However, their qualifications remain up to date with the current technology when considering the new generation of military aircraft.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer to comment n°88 made by your organisation.  
Refer to the resulting text.

comment 99

comment by: *Aircraft Engineers International (AEI)*

18. To support the changes as described above:

- EASA Form 19 should be changed to introduce a declaration to be made by the applicant that all applicable knowledge and experience requirements for both the basic license and the type rating (as applicable) have been met before application.

- the certificate of recognition for basic training should be changed to specify the date of examination completed and passed (for each module)

- the certificate of recognition for type training should be changed to specify the date of examination completed and passed as the start/end date of the type training now has to be recorded.

- the certificate of recognition for type training should be changed to reflect that type training will not be recognised if obtained prior to completion of the required basic modules or proven prior basic knowledge.

**Justification:**

The reason for not granting credits is that, AEI & EASA have serious doubts about the ability of persons without appropriate basic knowledge, gaining and

	retaining the necessary knowledge and understanding of the specific aircraft category they wish to be licensed on. After all one does not attend Secondary school before Primary school.
response	<p><i>Noted</i></p> <p>This point is not within the remit of the NPA's terms of reference for this rulemaking task.</p>
comment	<p><i>151</i> comment by: <i>Danish Metalworkers Union section: Civil Aviation</i></p> <p>Paragraph 14</p> <p>If the theoretical basic knowledge is giving by approved Part 147 organization, and the certificate off recognition is cover more modules then the practical experiences gives right to gain AML, no time limit for seven year will be valid for the rest of modules.</p> <p>Justification: In EC-countries, where the Aviation education is builds on apprenticeship, an Aviation Industry is small. All theoretical knowledge to all categories and subcategories are given.</p> <p>The problem will then be for industry, at flexibility off the workforce will disappear, when the 7 years time limit introduce to PART -66</p>
response	<p><i>Noted</i></p> <p>The comment is not understood.</p>
comment	<p><i>152</i> comment by: <i>Danish Metalworkers Union section: Civil Aviation</i></p> <p>Paragraph 14</p> <p>If EASA is concerned for the level of theoretical knowledge is not matching the development of the Aviation industries, then introduce continues training for basic knowledge.</p>
response	<p><i>Noted</i></p> <p>The agency understand the concept of "continuous training" but it would be only applicable to those who are already licensed.</p> <p>The intention of this NPA is to introduce a time limit for demonstrating with knowledge and experience requirement for applicants to a licence.</p> <p>Once the licence is granted, the Agency does not want to question the level of the basic knowledge over time otherwise same criteria should apply to diplomas, unversity degrees etc.</p>
comment	<p><i>163</i> comment by: <i>Malta Department of Civil Aviation</i></p> <p>Paragraph 17</p> <p>- to ensure an acceptable standard of multiple choice and essay questions</p> <p>Justification: There shall be more internal control and assessment of the questions produced in the competent authorities. From my experience in EASA Standardisation visits, internal quality control of multiple and essay type questions and model</p>

	answers has been poor or inexistent.
response	<i>Not accepted</i>  The agency understands the issue but this point is not within the remit of the NPA's terms of reference for this rulemaking task.
resulting text	Refer to the resulting text at the end of the document, last comment (or last segment)

**A. Explanatory Note - V. Regulatory Impact Assessment - Options**

p. 9-10

comment	<i>14</i>  Paragraph 20 b) comes to the conclusion that the suggestions of this NPA should be followed because the RIA revealed that they have a positive impact on safety. We are of the opinion that the result of the RIA was predetermined and therefore may not be used for justification or recommendation of the NPA. The suggestions of this NPA do not contain any improvement regarding safety. Only bureaucracy will be increased and individuals will be discriminated against. A limited time frame to show knowledge and experience does not improve safety, as the causes of not meeting a time frame do not necessarily imply incompetence of an applicant. Defining a fixed maximum number of attempts to pass an exam would rather serve the purpose of avoiding incompetent persons to acquire a licence (by the way, this is the usual way in any vocational training and Part-147 training should not be treated different), but this option has not been discussed at all. We also do not consider "applications based upon qualifications obtained 25 years earlier" to be a safety hazard at all. First of all, when a licence was obtained, basic knowledge will also not be questioned anymore, no matter how long ago it was obtained. At least any completed vocational training should not be treated different than an obtained licence and therefore it is necessary to credit such qualifications as long as a person is alive. It is also the wrong approach to just invalidate a passed exam in a Part-66 module after a certain time period. Instead, it must be looked at the real differences of the syllabus. If there aren't any, there is no justification to declare a passed exam invalid. If there are only minor differences, there should rather be delta-training/-examinations.	comment by: <i>Air Berlin</i>
response	<i>Partially accepted</i>  Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment. Refer to comments 3,4 and 7 made by your organisation. Refer to the resulting text.	
comment	<i>33</i>  Option 2 limits the validity of basic knowledge to 7 years, but no optional way is provided for applicants who exceed that period. Two alternative ways may be: - Possibility of a new examination for those expired modules. - Need to attend again to the basic course and pass the expired modules.	comment by: <i>Juan Ramon MATEOS CASADO</i>
response	<i>Noted</i>	

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
In fact a special mechanism has been created for the validity of the examination credits or the modules as well as the extension of that validity.

comment 43 comment by: *Svensk Flygteknikerförening, SFF (Org. of swedish Licensed Aircraft Engineers).*

**SFF supports Option 2 as the preferred option.** We make the same conclusions regarding the impact on safety and economy.

response *Noted*

resulting text Refer to the resulting text at the end of the document, last comment (or last segment)

## A. Explanatory Note - V. Regulatory Impact Assessment - Impacts

p. 10-12

comment 15 comment by: *Air Berlin*

Regarding the "Do nothing"-option, the RIA states that it would adversely affect safety. This is just a statement without justification and this supports our opinion that the result of the RIA was predetermined. There is no proof of a safety hazard if a person's 25 year-old university degree is being credited or a 10 year old examination in basic aerodynamics from a military training center. Furthermore, the benefit of experience and basic knowledge being recognized in practical work continuously over a long period of time is being completely neglected. The safety impact of the "Do nothing"-option must be changed to beneficial or at least neutral as no lowering of safety standards by applying the current regulation can be proven, especially compared to other regions of the world.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer to comments 3,4 and 7 made by your organisation.  
Refer to the resulting text.

comment 16 comment by: *Air Berlin*

Regarding the option 2, the RIA states that it would have a positive impact on safety and on equity and fairness, while there might be a slightly negative economic impact and no social impact at all. All these evaluations are just statements without justification and this supports our opinion that the result of the RIA was predetermined.

We do not recognize any safety benefit in building a correlation between knowledge/competence and the time frame in which it was shown. This is just bureaucracy without any safety benefit, as competence may not be regarded depending on a time frame, but rather on a passed exam! The safety impact of option 2 must be changed to neutral to come to a result reflecting reality.

Where does the RIA know from that only "few applicants are affected in this manner" regarding the economic impact of the suggestions of this NPA? Even if

this would be true, it is of utmost importance that the career of getting a licence is open to everyone, and not depending on finding a workplace to gain the required experience in time.

That there are no social and beneficial impacts regarding equity and fairness is not true. Persons who cannot cope with the seven-year period for sickness, familiar or financial reasons would be adversely affected. Both social and equity and fairness impacts must be changed to negative.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.

Refer to comments 3,4 and 7 made by your organisation.

Refer to the resulting text.

comment 18

comment by: *Air Berlin*

Regarding the option 3, the RIA states that it would have a negative impact on safety, while there might be a positive economic impact and neither social nor equity and fairness impacts at all. All these evaluations are just statements without justification and this supports our opinion that the result of the RIA was predetermined.

We do not recognize any safety hazard in simply not meeting a time frame in which knowledge/competence is shown. This is just bureaucracy without any effect on safety, as competence may not be regarded depending on a time frame, but rather on a passed exam! The statement that experience might not be up-to-date is simply not true because Part-66 requires at least half of the experience being reasonably current. The safety impact of option 3 must be changed to neutral to come to a result reflecting reality.

The economic impact of option 3 would not only be beneficial for "a few" organisations and individuals, but for all. It would take the economical pressure especially from self-starters and therefore also have positive social and equity and fairness impact.

response *Partially accepted*

The "recent" experience as a tool to maintain the level of knowledge has been in a certain manner retained. This is why it is now added in 66.A.30 (f) that the required experience shall have been started and completed within the ten years preceding the application for an aircraft maintenance licence.

For the validity of the basic knowledge, refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.

Refer to comments 3,4 and 7 made by your organisation.

Refer to the resulting text.

comment 33 ❖

comment by: *Juan Ramon MATEOS CASADO*

Option 2 limits the validity of basic knowledge to 7 years, but no optional way is provided for applicants who exceed that period.

Two alternative ways may be:

- Possibility of a new examination for those expired modules.
- Need to attend again to the basic course and pass the expired modules.

response *Noted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment. In fact a special mechanism has been created for the validity of the examination credits or the modules as well as the extension of that validity.

resulting text

Refer to the resulting text at the end of the document, last comment (or last segment)

**A. Explanatory Note - V. Regulatory Impact Assessment - Summary and Final Assessment**

p. 12

comment

19

comment by: *Air Berlin*

Attachment [#1](#)

It has been shown that the RIA has obviously been performed with a predetermined result. Therefore, the whole of the final assessment is wrong. With a correct evaluation of the safety benefits and the social and economic impacts of the suggestions of this NPA, the RIA would come to the conclusion that option 1 is neutral/slightly positive, option 3 is the best one and option 2 bears the most disadvantages.

Attached is a table which summarizes the evaluations as they should be according to our view, including the final result.

response

*Noted*

See replies to comments 15/16/18

comment

42

comment by: *Svensk Flygteknikerförening, SFF (Org. of swedish Licensed Aircraft Engineers).*

**SFF supports the Summary and Final Assessment as described under 22 page 12.** However we are of the opinion that applicants that already have started part 66 basic training at the time when these changes are amended to the regulation not should be affected by the changes. The reason is the national systems of education that may put applicants in a situation where years of training is wasted.

response

*Accepted*

Refer to the explanatory note of this CRD and the new proposal as described in sub-paragraphs 6 to 10 where clarity about examination credits and credit report have been added. The mechanism is now better described in 66.B.405 (d) and 66.A.25 (a) and (b): after ten years, the examination credit report should be re-evaluated to assess whether the national qualification standard or Part-66 Appendix 1 are changed.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this

proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

resulting  
text

Refer to the resulting text at the end of the document, last comment (or last segment)

## B. Draft Opinions - I Draft Opinion Part-66 - 66. A.10 Application

p. 13

comment 20

comment by: *Air Berlin*

Part-66.A.10 (b) should not be added because the applicant needs to get possible credits being confirmed by the authority before the correct scope of training can be started. This is simply not possible when an applicant has to demonstrate compliance with all requirements at the time of application. It must be regarded as the competent authority's responsibility to give a binding statement to the applicant which scope of training/examination has to be complied with. Otherwise, there is the possibility that people are doing (and paying!) too much or not enough, resulting in possible problems to comply with the overall time frame.

response *Noted*

Refer to the explanatory note of this CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit some elements of this comment. Refer also comments n° 3, 4 and 7 made by your organisation

comment

77 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

(a) An application for an aircraft maintenance licence or amendment to such licence ~~shall~~ **must** be made on EASA Form 19 and in a manner established by the competent authority and submitted thereto. An application for the amendment to an aircraft maintenance licence ~~shall~~ **must** be made to the competent authority that issued the aircraft maintenance licence.

Justification:

Most of the words "shall" are crosslined in red, replaced by "must" in blue, due to possible misinterpretations depending on who is reading and language barriers.

response *Not accepted*

In Part-66 requirements, the wording "shall" is used and for consistency this wording should be maintained.

comment *142* comment by: *CAA-NL*

66.A.10 should remain unchanged.

Justification:

Addition that application shall be supported by documentation is unnecessary.

response *Not accepted*

The agency received many comments from NAAs, explaining that some applications were not sustained by the proper documentation, which led to an increase of bureaucracy.

comment *164* comment by: *Malta Department of Civil Aviation*

(c) Formal requests for examination/qualification credits or shortening of experience requirements shall be enclosed with the application

Justification:

To support 66.A.25 b and 66.A.30, this is not currently covered. If there is no request these credits cannot be granted.

response *Noted*

Provisions according to the proposed subparagraph 66.A.10(b) cover the comment.

resulting text Refer to the resulting text at the end of the document, last comment (or last segment)

## **B. Draft Opinions - I Draft Opinion Part-66 - 66.A.25 Basic knowledge requirements**

p. 13

comment *21* comment by: *Air Berlin*

The last phrase which is suggested to be added to Part-66.A.25 (a) should not be added, or more modules/sub-modules should be added. In fact, most of the modules contain basic knowledge which widely apply and will not be subject to drastic changes. The possibility should be considered to rather check for changes in the modules when an examination was "too long ago", with subsequently requiring only delta-training/-examination, wherever possible. Instead of defining an unjustified "maximum validity" of passed exams to prevent incompetent people from obtaining a licence, this should rather be done by using "hard facts" such as inability to pass an exam by a defined maximum number of attempts. It is logical that a person not able to pass an exam is not competent enough to obtain a Part-66 licence, but there might be numerous other reasons why somebody does not complete everything within seven years.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer to comments n°3,4 and 7 made by your company.

comment 22

comment by: *Air Berlin*

The last phrase which is suggested to be added to Part-66.A.25 (b) should not be added. Declaring technical qualifications such as university degrees, passed apprenticeships, vocational training, military ranks etc. invalid for creditation after 7 years is discrimination and therefore forbidden. Completed degrees etc. must be credited throughout the life of a person. It is particularly problematic that not even continuous practical work experience would prevent a technical qualification to become outdated.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer to comments n°3,4 and 7 made by your company

comment 25

comment by: *TYROLEAN AIRWAYS*

66.A.25 a) and b)

1) We believe the exception for modules 1,2,3,4, should also apply to module 8 and 9. Due to the fact that there are almost no technology changes anymore to "Basic Aerodynamics" and "Human Factors". For personnel in a maintenance environment HF is also updated by the continuation training.

2) The 7 year limit imposes a problem when crediting modules from a national aeronautical school. i.e. calculating 4 years school, after that 1 year military service, followed by 3 years experience in aircraft industry (to obtain the AML) - may come very close to 7 years for individual modules (depending when they were instructed in school). 7 years is also limiting for female students taking their maternity leave during their aeronautical education. Therefore we recommend (if a time limit is considered necessary at all) a 10 years period.

response *Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits

where a change of module content has occurred

comment 31 comment by: *Juan Ramon MATEOS CASADO*

Basic modules content is defined in Commission Regulation (EC) No. 2042/2003, Annex III, Appendix I.

An applicant who has completed any module according to such content is up-to-date whilst the content remains without changes. There is no justification to impose a validity of 7 years if the content is not changed.

response *Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment. Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment 33 ❖ comment by: *Juan Ramon MATEOS CASADO*

Option 2 limits the validity of basic knowledge to 7 years, but no optional way is provided for applicants who exceed that period.

Two alternative ways may be:

- Possibility of a new examination for those expired modules.
- Need to attend again to the basic course and pass the expired modules.

response *Noted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.

In fact a special mechanism has been created for the validity of the examination credits or the modules as well as the extension of that validity.

comment 41 comment by: *EAMTC*

**PROPOSED TEXT:**

"with the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained within the 7 year period prior to the license or additional category/ sub-category application **unless if applicant can demonstrate a recent aeronautical maintenance experience "**

**JUSTIFICATION:**

Maintenance technicians who have recent aeronautical experience should keep benefits of their gained credits for others modules than 1 to 4. This draft may prevent technicians, and especially from the military, to get a civil license

without considering their experience and knowledge on latest aircraft systems. Furthermore, it may cause serious troubles to maintenance workshops in countries where new hires mostly come from the military.

response *Partially accepted*

1) The "recent" experience as a tool to maintain the level of knowledge has been in a certain manner retained. This is why it is now added in 66.A.30 (f) that the required experience shall have been started and completed within the ten years preceding the application for an aircraft maintenance licence.

2) For the validity of the basic knowledge, refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment 49

comment by: *DGAC France*

Add at the end of Part 66.A.25(b) : "unless the applicant can demonstrate appropriate recent aeronautical maintenance experience"

The proposal does not seem to take into consideration the case of the numerous AME who join the civil aviation system after some years spent in armed forces or other State service.

response *Partially accepted*

For the validity of the basic knowledge, refer to the explanatory note of this CRD, sub-paragraphs 6 to 10 where provisions have been added (such as provisions for the examination credits).

comment 51

comment by: *AgustaWestland*

If the validity period is increased above the actual 5 years, than the paragraph 147.A.145, record keeping, should be amended accordingly.

As a matter of fact, a Part 147 Organization at the moment may keep record of students files such as examinations and assessments documents for five years only.

response *Accepted*

Refer to the explanatory note of this CRD, sub-paragraph 10 where provisions

have been added in order to fit this comment. Relevant record keeping requirements have been extended to at least 11 years, in order to fit the new validity, either for Part 66 or Part 147.

comment 52

comment by: *AgustaWestland*

We disagree with the 7 years validity period. If a time limit shall be established, we suggest to choose 10 years, or limit in time only very few basic modules.

The support personnel within a Part 145 Organization, often is gaining some experience working in maintenance environment while is taking basic training or examinations. In such example, when the industry is supporting the applicant in taking basic knowledge examinations and the credits expires, the company will pay this price on its own expenses.

An applicant just graduated from a secondary technical school will have problems in finding a position as helper because the industry will always choose personnel already in possession of a valid AML, since technical secondary school study are not recognize as basic knowledge credits.

Also, the validity limit applies to Academic credits as well. It is our opinion that an University Degree and the credits associated with it should not expire after a fixed time.

As a result, for the industry will become a must to recruit personnel already licensed only, instead of growing their own talents. The cost impact for the industry will be remarkable.

response *Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment. Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment 58

comment by: *EAMTC*

the "technical qualifications used as basis to gain credits" may be a University's or other higher educational institute's degree (that was the case used by the HCAA for exceptions already) therefore it is not possible to "expire" after a 7 years period. We think that EASA has to consider that.

response *Accepted*

The "seven years" validity will be extended to ten years.

comment 60

comment by: *ENAC*

**66.A.25 (a)**

In many member states is possible to gain an academics degree in 3 to 5 years. The syllabus of appendix 1 doesn't justify such a long period of time to pass all basic knowledge modules. In addition there is no change in the requirement for Part-147 organisations, or competent authorities for a longer record retaining time.

This can lead to the impossibility to verify if a certificate of recognition is genuine. If modules 1,2,3,4 will have unlimited duration the check of falsified certificates will be almost impossible. We suggest to keep the limit current limit of 5 years. Enac believes that an archiving time of more than 10 years is unrealistic, useless and is an additional burden for the NAA's.

**66.A.25 (b)**

If the basis of the credit is an academics degree, there may be legal issues in some member states, where an academics degree doesn't expire; we suggest to extend the credit to unlimited for all modules, at least for modules 1,2,3,4,5,8.

response

*Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to fit the nature of this comment.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

66

comment by: *Air Force Command and Combat Support School*

This comment is made by 1st Lieutenant Kenneth Voller, Training Manager at the Air Force Command and Combat Support School in Denmark.

The Air Force Command and Combat School (AFS) has been Part 147 approved since 2004 (approval number DK.147.0002) in accordance with Regulation (EC) 1592/2002.

**Regarding the proposed change in Part-66, 66.A.25.**

- If the change is applied to Part-66, the mechanics who receive a Certificate of Recognition (COR) from the AFS and afterwards gain maintenance experience on Air Force (AF) aircraft, will not be able to apply for an Aircraft Maintenance Licence (AML) after completing the required experience from a Regulation (EC) 2042/2003 – Part-145/Part-M organisation as specified in Regulation (EC) 2042/2003 – Part-66, 66.A.30.e.
- The AFS agrees to the importance of ensuring a “good safety level” which is the goal of the proposal, but the AFS does not believe that the “7 year time limit” has any impact on the general safety level when an applicant can document relevant experience at the where he applies for an AML. Furthermore, the AFS believes it would be a contradiction if the

Regulation (EC) 1592/2002 at one point encourages military training facilities to apply the Regulation (EC) 2042/2003 – Part-147 wherever possible and then later in Regulation (EC) 2042/2003 – Part-66 places limitations which practically makes the first one worthless to implement.

- Another consequence to the AFS is that this change, if applied to the Regulation (EC) 2042/2003 – Part-66, would pose a serious threat to possible recruitment to the basic training course. In the end this will probably affect the AFS so seriously that the training program will be terminated or at least be very limited making it impossible to train the required number of mechanics.

Based on the above comments, the AFS strongly recommends that the “7 year period” change to the Regulation (EC) 2042/2003 – Part-66, 66.A.25 is NOT applied as it will do nothing to the general safety level if an AML-applicant provides the required experience documentation.

response *Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment 78 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

(a) An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence ~~shall~~ **must** demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part-147 or by the competent authority. *With the exception of modules 1, 2, 3 and 4, each individual module becomes invalid after 7 years.*

(b) Full or partial credit against the basic knowledge requirements and associated examination ~~shall~~ **must** be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits ~~shall~~ **must** be established in accordance with Section B, Subpart E of this Part. *With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained within the 7 year period prior to the licence or additional category / sub-category application.*

Justification:

Most of the words “shall” are crosslined in red, replaced by “must” in blue, due to possible misinterpretations depending on who is reading and language

response	<p>barriers.</p> <p><i>Not accepted</i></p> <p>In Part-66 requirements, the wording "shall" is used and for consistency this wording should be maintained.</p>
comment	<p>82 <span style="float: right;">comment by: IAAG</span></p> <p>(b)  "with the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained within the 7 year period prior to the license or additional category/ sub-category application <b>unless if applicant can demonstrate a recent aeronautical maintenance experience</b></p> <p>Justification:  Maintenance technicians who have recent aeronautical experience should keep benefits of their gained credits for others modules than 1 to 4. This draft may prevent technicians, and especially from the military, to get a civil license without considering their experience and knowledge on latest aircraft systems. Furthermore, it may cause serious troubles to maintenance workshops in countries where new hires mostly come from the military.</p>
response	<p><i>Noted</i></p> <p>Refer to the explanatory note of the CRD, sub-paragraphs 5 and 6 to 10 where provisions have been added in order to fit the nature of this comment. Experience will have to be gained within the last 10 years preceeding the AML application.</p>
comment	<p>92 <span style="float: right;">comment by: Anders Ljungstedts gymnasium</span></p> <p>(a)  An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exeption of modules 1, 2, 3 and 4 each individual module becomes invalid <b>after 10 years</b></p> <p>Justification:  Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:</p> <p>2 years at the Upper Secondary School (if the first examination is passed in the end of year one)</p> <p>1.5 years at the University</p>

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

93

comment by: *Anders Ljungstedts gymnasium*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

Justification:

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

101

comment by: ACS, Häsrlögymnasiet

(b) Full or partial credit against the basic knowledge requirements and associated examination shall be given for any mother technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained within a 10 year period prior to the licence or additional category/sub-category application.

Justification:

**ACS** Aviation College of Sweden supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)
- 1.5 years at the University
- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

106

comment by: *ACS, Håsslögymnasiet*

(a) An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147- or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid after 10 years  
Justification:

**ACS** Aviation College of Sweden supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)
- 1.5 years at the University

- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

108

comment by: *Lufttransport AS*

(a)

With the exception of modules 1, 2, 3, 4, and 8 each individual module becomes invalid after 12 years from the date of passed examination.

Justification:

Module 8 should be added to the excepted modules as there is no development in this module.

The no. of years should be raised from 7 to 12 as the approved training to B1/B2 standard will take 3-4 years .

In addition the requirement for practical training is varying from 2 – 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment contributes to the general understanding of

response	<p>the aviation system.</p> <p><i>Partially accepted</i></p> <p>Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism. Refer also to the resulting text.</p> <p>The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).</p> <p>As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred</p>
comment	<p><i>109</i> <span style="float: right;">comment by: <i>Lufttransport AS</i></span></p> <p>(b) With the exception of modules 1, 2, 3, 4, and 8 technical qualifications used as a basis to gain credits must have been obtained within the 12 year period prior to the licence or additional category or / sub-category application.</p> <p>Justification:</p> <p>Module 8 should be added to the excepted modules as there is no development in this module.</p> <p>The no. of years should be raised from 7 to 12 as the training to B1/B2 standard will take at least 3-4 years .</p> <p>In addition the requirement for practical training is up to 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment contributes to the general understanding of the aviation system.</p>
response	<p><i>Partially accepted</i></p> <p>Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism. Refer also to the resulting text.</p> <p>The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66</p>

Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

110

comment by: *Inge KIEDROWSKI - Norwegian Air Ambulance*

(a)

With the exception of modules 1, 2, 3, 4, and 8 each individual module becomes invalid after 12 years from the date of passed examination.

Justification:

Module 8 should be added to the excepted modules as it is fairly static and no development in this module.

The no. of years should be raised from 7 to 12 as the approved training to B1/B2 standard in most cases will take 3 - 4 years .

In addition the requirement for practical training is varying from 2 – 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment, contributes to the general understanding of the aviation system. In order to avoid any misunderstanding the time should be counted from the date of passed examination.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of

the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment *111* comment by: *Inge KIEDROWSKI - Norwegian Air Ambulance*

(b)

With the exception of modules 1, 2, 3, 4, and 8 technical qualifications used as a basis to gain credits must have been obtained within the 12 year period prior to the licence or additional category or / sub-category application.

Justification:

Module 8 should be added to the excepted modules as it is fairly static and no development in this module.

The no. of years should be raised from 7 to 12 as the training to B1/B2 standard will take at least 3-4 years in most cases.

In addition the requirement for practical training is up to 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment contributes to the general understanding of the aviation system.

response *Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment *112* comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

66.A.25 (a), (b), Appendix II 1.12 and Appendix V (4)

The Swedish CAA suggests that the 7 year period should be amended to a 10 year period in which all the requirements for qualification to a Part-66 AML must be obtained.

Justification:

All the basic training organizations in Sweden which are approved according to Part-147, is part of the Swedish public school system. This national system mandates all these schools to extend over 3 years. These 3 years must include a certain amount of compulsory subjects, which leads to that it is possible to contain the training up to Cat A in these 3 years. If someone wants to be trained up to Cat B1 or B2, this requires another year of training. This leads to that an applicant has got another 3 years left in which he/she must obtain the practical experience of at least 2 years. The Swedish CAA considers this giving the applicants a too small margin to obtain the required practical experience.

response *Accepted*

The "seven years" validity will be extended to ten years.

comment

115

comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

Personnel who has undergone examination in all modules, and is actively working with aircraft maintenance within a military aviation environment, and exercising CRS privileges in areas corresponding to cat-A, B1, B2 and C respectively, should not be subject to the seven year limit. This is under the condition that they can present evidence of these privileges upon request from the NAA.

Justification:

It is considered that equivalent safety will be reached since this group of personnel is working actively with aircraft maintenance within the military aviation environment, and thus attaining due practical experience on aircraft maintenance within the stipulated 7 years.

There are concerns for personnel that have passed full examinations according to Part-66, and then working in a military maintenance environment. They will not be able to go back to a civil maintenance environment, and still keep their qualifications.

It is also worth mentioning that the Swedish military systems for personal licences for maintenance personnel (RML-P-6) and for maintenance training organizations (RML-V-7) are based on Part-66 and Part-147 respectively.

response *Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 5 and 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also

apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Experience will have to be gained within the 10 years preceeding the AML application.

comment

116

comment by: *Wideroe*

(a)

With the exception of modules 1,2,3,4 and 8 each individual module becomes invalid after 12 years from the date of the passed examination.

Justification:

Module 8 should be added to the list of exemted modules as the basics is unlikely to change.

The number of years should be increased from 7 to 12 as the approved training to B1/B2 rating will take 3-4 years.

In addition the requirement for practical training is varying from 2-5 years. On top, young men must perform their military service (compulsuary in Norway) of app. 1 year.

In order to avoid "running out of time" on the first examinations, the total timeframe should be increased from 7 to 12 years.

We should also bear in mind that when working in an aviation maintenance environment, quite a lot of the basic subjects will be enforced and refreshed as a prerequisite for the individual to be able to perform the different tasks that is part of aircraft maintenance.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

117

comment by: *Wideroe*

(b)

With the exception of modules 1,2,3,4 and 8 , technical qualifications used as a basis to gain credits must have been obtained within the 12 year periode prior to the license or additional category/sub-category application.

Justification:

Module 8 should be added to the list of exemted modules as the basics is unlikely to change.

The number of years should be increased from 7 to 12 as the approved training to B1/B2 rating will take 3-4 years.

In addition the requirement for practical training is varying from 2-5 years. On top, young men must perform their military service (compulsuary in Norway) of app. 1 year.

In order to avoid "running out of time" on the first examinations, the total timeframe should be increased from 7 to 12 years.

We should also bear in mind that when working in an aviation maintenance environment, quite a lot of the basic subjects will be enforced and refreshed as a prerequisite for the individual to be able to perform the different tasks that is part of aircraft maintenance.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

120

comment by: *Flygteknik Technical Training*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this

Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

Justification:

Flygteknik Technical Training supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry

into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

121

comment by: *Flygteknik Technical Training*

(a)

An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid **after 10 years**

Justification:

Flygteknik Technical Training supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who

started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

122

comment by: *Norwegian Royal Airforce Training Centre Kjevik**(a)**New proposed text:*

With the exception of modules 1,2,3 and 4 each individual module becomes invalid after 7 years. *The required period of 7 years will not come into force provided that the applicant has an uninterrupted period of experience in an operative aircraft maintenance environment that complies with the requirements applicable to aircraft maintenance practice.*

Justification:

1) This is to ensure that this NPA will not have a devastating effect for approved Part 147 organizations operating in a military environment.

2) This is to ensure that applicants who have completed and passed the part 147 approved basic training course in a civilian Part 147 organization can start and have a continuous career in a military maintenance organization without being forced to leave the military due to impact of the proposed 7 year rule.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

126

comment by: AEA

*(b)*

*"With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained within the 7 year period prior to the licence or additional category / sub-category application"*

The sentence under 1b. of this form shall be deleted.

Justification:

A professional qualification i.e. as a car mechanic or a German "Luftfahrzeugmechaniker" cannot be used as a basis to gain credits after 7 years. I understand however, that the qualification gained by the Aircraft Maintenance License can be used to gain credits indefinitely i.e. for extending a Part-66 AML from category A to B, or from one subcategory to another. I consider this to be a significant inconsistency and a violation of being treated equally by the law - on the one hand. On the other hand, students that loose these credits will be forced to do the examinations only - as opposed to a Part-147 approved training, which becomes unaffordable because of its longer duration. Unapproved courses will gain strong momentum then. It is probable to reach the 7 year limit if i.e. a car mechanic or a German "Luftfahrzeugmechaniker" first becomes a Cat A mechanic and then after some years intends to acquire a Cat B qualification.

response

*Noted*

The Agency preferred to revise the concept under (b).

It has been considered that technical qualifications shall not expire (sub-paragraph 14 of this CRD's explanatory note).

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

The level of basic knowledge is not the same between a CAT A and a CAT B licence.

comment

133

comment by: *Skytec AS*

(a)

With the exception of modules 1, 2, 3, 4, and 8 each individual module becomes invalid after 12 years from the date of passed examination.

Justification:

Module 8 should be added to the excepted modules as there is no development in this module.

The no. of years should be raised from 7 to 12 as the approved training to B1/B2 standard will take 3-4 years .

In addition the requirement for practical training is varying from 2 – 5 years. On top, young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind that working in an aviation maintenance environment contributes to the general understanding of the aviation system, focus on safety and human factor.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

134

comment by: *Swedish National Agency for Education*

The Swedish National Agency for Education has been acquainted with a proposal of a NPA from EASA concerning Part-66 aircraft maintenance licence. In the NPA it is suggested that all practical and theoretical basic education shall be carried out within 7 years.

#### **Standpoint from the Swedish National Agency for Education**

In the Swedish school system a time limit of 7 years can cause problems for a student. The following will give an example why:

The student starts the education with the first module the second year (of three) at the upper secondary school. Some students even start the first year. Two (or three) years later the student finishes the upper secondary school. Some of the boys then have to make, at least, one year of military service.

After upper secondary school the student have to study 1 – 1½ year at a technical education to reach the level B1.

4 – 5½ years have now passed since the student started the first module.

After the technical education the student have to get a job to get two years qualifying practical training before the licence can be issued.

That means that the licence is issued 6 – 7½ years after the education begun, providing that the student doesn't fail in some modules or have difficulties to find a suitable job.

If there is need for a time limit The Swedish National Agency for Education consider that a limit of 10 years would be more adequate for the Swedish school system

response

*Accepted*

The "seven years" validity will be extended to ten years.

comment

137

comment by: *Zoltán PÁVEL*

(a)

I can accept the timeframe limitation of 7 years for fulfilment of the basic knowledge and experience requirements for obtaining a Part-66 basic category or subcategory even in some cases there may be some difficulties generated for applicants coming from other trades.

Justification:

It is right approach to require basic training module examinations to be taken within a dedicated time frame. However, for those intended to obtain a Part-66 licence with gaining experience of 5 years it also should be taken into consideration that the applicant in some cases may not spend all of his/her time to gain the required experience because he/she shall work in other place to finance the training. In the case of the 7 year time limit and 5 years of required experience he/she should gain experience in more than 2/3 of his/her time. This scenario may be an excluding limitation for personnel intended to maintain (and certify) aircraft under Part-M provisions as private. (For example: in recreation aviation)

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content).

Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

138

comment by: *European HEMS and Air Ambulance Advisory Committee (EHAC)*

(a)

With the exception of modules 1, 2, 3, 4, and 8 each individual module becomes invalid after 12 years from the date of passed examination.

Justification:

Module 8 should be added to the excepted modules as there is no development in this module.

The no. of years should be raised from 7 to 12 as the approved training to B1/B2 standard will take 3-4 years .

In addition the requirement for practical training is varying from 2 – 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment contributes to the general understanding of the aviation system.

response

*Partially accepted*

Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

139

comment by: *European HEMS and Air Ambulance Advisory Committee (EHAC)*

(b)

With the exception of modules 1, 2, 3, 4, and 8 technical qualifications used as a basis to gain credits must have been obtained within the 12 year period prior

to the licence or additional category or / sub-category application.

**Justification:**

Module 8 should be added to the excepted modules as there is no development in this module.

The no. of years should be raised from 7 to 12 as the training to B1/B2 standard will take at least 3-4 years .

In addition the requirement for practical training is up to 5 years. On top young men must perform their military service of app. 1 year. In order not to run out of time for the first examinations, the total time frame should be increased from 7 to 12 years. We should also bear in mind, that working in an aviation maintenance environment contributes to the general understanding of the aviation system.

response

*Partially accepted*

A ten year period has been retained.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

143

comment by: CAA-NL

66.A.25(a) ....With the exception of modules 1,2,3 and 4, certificates of recognition for successfully completed Part-147 category basic training becomes invalid seven years after the issuing date. In case of individual module certificates, the individual validity is 7 years maximum.

**Justification:**

66.A.25(a) It is not practical and not common practice to use different validities for the exams that are part of an overall training. Furthermore it makes verifications much more difficult and prone to errors.

response

*Noted*

Appendix III of Part 147 (training certificate) had been modified accordingly as start and end date of training passed is now required. The user will have to fill in the document either for a full course or an individual module.

comment

*144*comment by: *CAA-NL*

66.A.25(b) .. With the exception of modules 1,2,3 and 4, the validity of credits, based on other technical qualifications, is limited to 7 years from the date the qualifications were obtained.

Justification:

66.A.25(b) In many cases formal qualifications are obtained after all necessary exams are completed. Individual exam dates are not mentioned on the certificates. Furthermore it is impractical to verify all individual exams. An other aspect is that the validity of the credits should also be limited. It is not important when the credit is given, it should expire seven years after the training on which it was based is completed.

response

*Partially accepted*

Now examination credits will expire after ten years or they will have to be re-evaluated after 10 years IAW 66.B.405 (b).

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Same mechanism applies for examination credits.

comment

*153*comment by: *CAA-Norway*

(a)

With the exception of modules 1, 2, 3, 4 and 8 .....

Justification:

Module 8, Aerodynamics has not changed during the last decades.

response

*Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment 156

comment by: *Ulf LARSSON*

(a)

An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid **after 10 years**

Justification:

I support the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

response

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

157

comment by: *Ulf LARSSON*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

Justification:

I support the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

*161*

comment by: *Dassault Aviation*

(b)

The requirement " ...Technical qualifications used as a basis to gain credits must have been obtained within the 7 year period prior to the licence application" appears too severe when the persons have been practicing maintenance activities for many years after their initial technical qualification . It will be then more difficult to recrute technicians in the field with that experience due to the fact that most of them will have to spend many time in formation and go in an examination. Consequently we are not in favour with this § amendment. An extension of the delay to 15 years would be more acceptable.

response

*Partially accepted*

The "seven year" validity will be extended to "ten years" and flexibility will be given for extension if it appears that Part 66 Appendix 1 has not changed

during the period of time to be considered.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

166

comment by: CAA - Denmark

(a)

Delete proposed text "With the exception of module 1, 2, 3 and 4, each individual module becomes invalid after 7 years".

Justification:

Denmark does not support to do a module examination invalid after 7 years, for several reasons mainly because we find the approach wrong.

To support this :

1. The age of an examination (7 years) alone, to measure a persons technical knowledge for issuing a licence, is inadequate and not the tool if we want control and ensure a good safety level. From our experience a lots of elements must be taken into consideration, elements as update training given in a part 145 organisation under 145.A.30(e), practical experience from the category/subcategory, additional courses/training given under part 145 control. Only if a student do not work in a maintenance environment it could be relevant to consider a limited life for the module examination only.
2. 90 % of the Danish applicants for an AML licence receive an apprentice part 147 training where training is and alternation between theory/practical training at the part 147 organisations and practical training in the part 145 organisation where the student is employed. The practical training is given in subcategory relevant for the organisation where the student is employed. For a subcategory not covered under the organisations authorisation, no practical training in the 145 organisation can be given. But all students receive theoretical and practical training at the 147 organisation in all modules/subcategories to give maximum flexibility for the individual, to change from one company to another and it gives a broad theoretical knowledge as an advantage for the part 145 organisations. Some examinations will therefore be outside the 147 training and only approved as module examination. These examinations will be invalid after seven years. The student could have received an AML in a

subcategory, be working in a maintenance environment and to this it must count that before a new category can be added or issued we have the control given in appendix IV to part 66, but we claim it invalid on module examination alone.

3. We have a tradition, going more than 50 years back due to country size, to coordinate training in the Air Force with the civil training. Due to this the Danish Air Force have adopted (EC) 2042/2003 from day one, and are part 147 approved. The students receive training in the same subjects as in a civil training organisation, they receive a Certificate of Recognition. The AML issue is controlled by the rule of one year civil experience. People can work in the Air Force for years, on fighters, helicopters, aeroplanes with piston or turbine engines of which many have a civil parallel. They do work in a maintenance environment in the same subcategories and with the same problem as you have in the field of civil aviation. The examination given under this training will be invalid after seven years. If you want to work in a civil organisation and apply for an AML you must do the examination again if more than seven years has gone even if you have a knowledge and skill at the same level as in the civil aviation. It's a waste of experience and knowledge.
4. We find the proposal in conflict with the intension of (EC) 1592/2002 Chapter 1, article 1 (2) and article 2, 2(b)(c) regarding training in Air Force etc, e.g the Danish Airforce Part 147 approval.
5. An AML is not declared invalid after 7 if not used for some or all subcategories, we do not control this part during review, only control is if the licence and CAA information agree. We leave it to the part 145/F organisations and the audits done here. We could control it, but it will be a greater administrative burden without leading to a higher safety level.
6. An amendment to part-66 where a module is changed and additional items added, could be controlled with an approved part 147 bridge examination or it could be part of type training or type examination.
7. The regulation 2042 is strong enough to control the issue of a licence, even for older examinations, if a more practical approach to the control and documentation is taken, we have recent experience 66.A.30, appendix IV to 66, civil experience, part 145.A.30(e) and 66.A45. appendix III, 2.1 (technology) type training and so on and in addition the assessment or examination for the type and when a person is accepted as certifying staff we have continuation training in 145 and finally an individual assessment for each person involved in maintenance. We find the 7 years limits could give a negative effect on the industry in recruiting new people or it could prevent people or organisations to invest in the future.
8. A limit could be given in the AMC for people not working in a maintenance environment.

response *Partially accepted*

The "seven year" validity will be extended to "ten years" and flexibility will be given for extension if it appears that Part 66 Appendix 1 has not changed during the period of time to be considered.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where

provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

167

comment by: CAA - Denmark

(b)

Delete proposed text "With the exception of module 1, 2, 3 and 4, technical qualifications used as a basic to gain credits must have been obtained within the 7 year period prior to the licence or additional category/sub-category application."

Justification:

Denmark does not support to do module examination invalid after 7 years, except for module 1, 2, 3 and 4, for several reasons mainly because we find the approach wrong.

To support this, the same argumentation as given for 66.A.25(a) is used :

1. The age of an examination (7 years) alone, to measure a persons technical knowledge for issuing a licence, is inadequate and not the tool if we want control and ensure a good safety level. From our experience a lots of elements must be taken into consideration, elements as update training given in a part 145 organisation under 145.A.30(e), practical experience from the category/subcategory, additional courses/training given under part 145 control. Only if a student do not work in a maintenance environment it could be relevant to consider a limited life for the module examination only.
2. 90 % of the Danish applicants for an AML licence receive an apprentice part 147 training where training is and alternation between theory/practical training at the part 147 organisations and practical training in the part 145 organisation where the student is employed. The practical training is given in subcategory relevant for the organisation where the student is employed. For a subcategory not covered under the organisations authorisation, no practical training in the 145 organisation can be given. But all students receive theoretical and practical training at the 147 organisation in all modules/subcategories to give maximum flexibility for the individual, to change from one company to another and it gives a broad theoretical knowledge as an advantage for the part 145 organisations. Some examinations will therefore be outside the 147 training and only approved as module examination. These examinations will be invalid after seven years. The student could have received an AML in a

subcategory, be working in a maintenance environment and to this it must count that before a new category can be added or issued we have the control given in appendix IV to part 66, but we claim it invalid on module examination alone.

3. We have a tradition, going more than 50 years back due to country size, to coordinate training in the Air Force with the civil training. Due to this the Danish Air Force have adopted (EC) 2042/2003 from day one, and are part 147 approved. The students receive training in the same subjects as in a civil training organisation, they receive a Certificate of Recognition. The AML issue is controlled by the rule of one year civil experience. People can work in the Air Force for years, on fighters, helicopters, aeroplanes with piston or turbine engines of which many have a civil parallel. They do work in a maintenance environment in the same subcategories and with the same problem as you have in the field of civil aviation. The examination given under this training will be invalid after seven years. If you want to work in a civil organisation and apply for an AML you must do the examination again if more than seven years gone even if you have a knowledge and skill at the same level as in the civil aviation. It's a waste of experience and knowledge.
4. We find the proposal in conflict with the intension of (EC) 1592/2002 Chapter 1, article 1 (2) and article 2, 2(b)(c) regarding training in Air Force etc, e.g the Danish Air force Part 147 approval.
5. An AML is not declared invalid after 7 if not used for some or all subcategories, we do not control this part during review, only control is if the licence and CAA information agree. We leave it to the part 145/F organisations and the audits done here. We could control it, but it will be a greater administrative burden without leading to a higher safety level.
6. An amendment to part-66 where a module is changed and additional items added, could be controlled with an approved part 147 bridge examination or it could be part of type training or type examination.
7. The regulation 2042 is strong enough to control the issue of a licence, even for older examinations, if a more practical approach to the control and documentation is taken, we have recent experience 66.A.30, appendix IV to 66, civil experience, part 145.A.30(e) and 66.A45. appendix III, 2.1 (technology) type training and so on and in addition the assessment or examination for the type and when a person is accepted as certifying staff we have continuation training in 145 and finally an individual assessment for each person involved in maintenance. We find the 7 years limits could give a negative effect on the industry in recruiting new people or it could prevent people or organisations to invest in the future.
8. A limit could be given in the AMC for people not working in a maintenance environment.

response *Partially accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2, 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred

comment

174

comment by: *Priority Aero Maintenance AB*

(a)

An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid **after 10 years**

Justification:

Priority Aero Maintenance AB supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

response

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

175

comment by: *Priority Aero Maintenance AB*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

Justification:

Priority Aero Maintenance AB supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

179

comment by: *Flygarbetsgivarna*

(a)

An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid **after 10 years**

Justification:

Flygarbetsgivarna supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the

AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

180

comment by: *Flygarbetsgivarna*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

**Justification:**

Flygarbetsgivarna supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

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1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry

into force of this Opinion (new paragraph 66.A.30(g));

- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

184

comment by: *Nordiskt FlygTeknikCentrum AB*

(a)

An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part 147 or by the competent authority. With the exception of modules 1, 2, 3 and 4 each individual module becomes invalid **after 10 years**

Justification:

Nordiskt FlygTeknikCentrum supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

185

comment by: *Nordiskt FlygTeknikCentrum AB*

(b)

Full or partial credit against the basic knowledge requirements and associated examination shall be given for any other technical qualification considered by the competent authority to be equivalent to the knowledge standard of this Part. Such credits shall be established in accordance with section B, subpart E of this Part. With the exception of modules 1, 2, 3 and 4, technical qualifications used as a basis to gain credits must have been obtained **within a 10 year period** prior to the licence or additional category / sub-category application.

Justification:

Nordiskt FlygTeknikCentrum supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The "seven years" validity will be extended to ten years.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

resulting  
text

Refer to the resulting text at the end of the document, last comment (or last segment)

**B. Draft Opinions - I Draft Opinion Part-66 - 66.A.45 Type/task training and ratings**

p. 14

comment

23

comment by: *Air Berlin*

The suggested extension of the last phrase of paragraph Part-66.A.45 (d) points into the right direction. But the overall time frame of 3 years is particularly too short. It should be changed to not less 5 years and an opening clause for continuous/recent type experience as well as a "refresher" option should also be introduced. It would be wrong to say that someone whose type training was 10 years ago, but who worked continuously on the type since then, has insufficient type knowledge. Furthermore, Part-147 type training can be regarded as of such a high quality level that even after the defined "validity" of the training and without practical experience, knowledge could be easily being refreshed by a shortened course.

response

*Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the

community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

Additionally, somebody having passed the type training examination and getting continuously experience on the aircraft type should seek the endorsement of the aircraft type on the licence

comment

34

comment by: *Juan Ramon MATEOS CASADO*

It is not clearly defined the applicability of this requirement for type training gained based on a difference course. In this case, this paragraph should consider the three years period only for the difference course, not for the whole type training.

response

*Noted*

The requirement is applicable to all courses (Full courses and differences courses). Any course has to be completed within a three year period preceding the application.

comment

35

comment by: *Airbus***AFFECTED PARAGRAPH:**

66.A.45 Type/task training and ratings, Paragraph (f) and Paragraph (h)

**PROPOSED TEXT:**

66.A.45 Type/task training and ratings

In Subparagraph (f) , second sentence, add the underlined word:

"The examination shall comply with Appendix 3, paragraph 3 to this Part"

In Subparagraph (h) 2. , first sentence, add the underlined word:

"The examination shall comply with Appendix 3, paragraph 4 to this Part"

**JUSTIFICATION:**

We understand that Appendix III paragraph 4 is not for type training examinations.

Although 66.A.45 (f) and 66.A.45 (h)2. are not parts of the changes proposed with this NPA, we request to consider the proposed texts above to give emphasis to Appendix III applicability issues for the sake of clarity.

response

*Noted*

The agency understands the point but it is out of the remit of this NPA. Nevertheless the comment will be passed to NPA 2007-07 (Privileges of B1/B2 - Type and group ratings - type training)

comment

37

comment by: *Juan Ramon MATEOS CASADO*

Three years' period is not clearly justified for completing the type training and applying for a type rating endorsement. A minimum of five years would be desirable.

The Certificate of Recognition, issued after passing type training, remains updated for each individual aircraft type. There is no safety item nor technological change to justify this time limit.

In addition, according to 145.A.35(c), any AML holder who wants to exercise his certifying staff privileges needs a minimum of six months of current experience on that type during the last two years. This guarantees his whole knowledge (theoretical and practical) remains updated in the moment of the application.

response *Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

comment 38

comment by: *AEROK*

66.A.45(d)

There is common practice in the air industry working after finishing type training without getting type licence immediately. Somebody may not prefer to take more responsibility in her/his job because of personnel life situation (family affairs, conflict with the management etc.). If she/he still working on the type and is participant of the continuation training (keeping the own knowledge in level), why does not allow them to get type licence later. Our proposal is harmonising the new requirements to this two years period, which should start with the date of last successful type training theoretical examination. In the first two years period the practical assessments should be finished, and the applicant should take part in continuation training also in this starting period. As far as the applicant is participating in continuation training and can document the necessary working practice she/he may apply for type licence to the NAA.

response *Noted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

comment 53

comment by: *AgustaWestland*

Our opinion is that three years validity period seems too restrictive, since often, there might be some personnel associated with aircraft maintenance that attended the theoretical training without a formal practical elements in order to perform its tasks even if is not an AML holder but is undergoing the

issue process, or due to his/her duty the Certifying Staff did not perform the practical elements of a type training. The three years validity period will have remarkable repercussion on industry costs for personnel certification. If a validity period has to be established for the different elements of a type training, we propose that after the time of validity has expired, a refresher maintenance type training course can be performed to extend the validity of theoretical elements.  
The duration of this course can be established by the Training Manager of the Maintenance Training Organization that issued the certificate of recognition.

response

*Not accepted*

This concept has not been retained by the Agency as it complicates the process.  
Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

comment

61

comment by: ENAC

A three year period seems too long, and is inconsistent with the conditions printed on the AML such as *"the privileges may be exercised with 6 months experience in the last 24, or meeting the provision for the issue of the appropriate privileges"*. This can lead to issue of new licences, with rating granted on courses (both theoretical and practical) passed 35 months prior to the issue of the license, that will permit immediate issue of a CRS. We suggest to put the validity limit at *"24 months, that can be extended to 36 months, when the applicant can demonstrate 6 months of experience in the last 24"* on the specific aircraft.

**Note:** nothing is stated for C category. It must be clear if these certificates expire after 3 years or if they have unlimited duration. We suggest to put the limit at 3 years.

response

*Noted*

66.A.20 (b)2: The holder of an AML may not exercise certification privileges unless in the preceding two year period he/she has, either had six months of maintenance experience in accordance with the privileges granted by the AML or met the provision for the issue of the appropriate privileges.

The second part of 66.A.20 (b)2 ("met the provision for the issue of the appropriate privileges") will apply to the applicant to which a type training has been granted.

The requirement is applicable to all courses in all categories. Any course has to be completed within a three year period prior to the application.

comment

73

comment by: dba Luftfahrtgesellschaft mbH

... and shall have been started and completed within the five years preceding the application for a type rating endorsement.

... I have completed the relevant type training within the preceding 5 years from the date of this application.

Justification:

The validity of a type training should be extended to a minimum of 5 years as applicants may need more than three years to complete education and gain appropriate knowledge related to their function as Certifying Staff.

The NAA should be authorised to decide about the necessity of further qualification measures regarding type training after this five years period.

response *Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

Experience to be gained in order to be qualified as certifying staff is a different issue and differs from the time limit frame for training.

comment 79 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

(a) The holder of a category A aircraft maintenance licence may only exercise certification privileges on a specific aircraft type following the satisfactory completion of the relevant category A aircraft task training carried out by an appropriately approved Part-145 or Part-147 organisation. The training ~~shall~~ **must** include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training ~~shall~~ **must** be demonstrated by an examination and/or by workplace assessment carried out by an appropriately approved Part-145 or Part-147 organisation.

(b) Except as otherwise specified in paragraph (g), the holder of a category B1, B2 or C aircraft maintenance licence ~~shall~~ **must** only exercise certification privileges on a specific aircraft type when the aircraft maintenance licence is endorsed with the appropriate aircraft type rating.

(c) Except as otherwise specified in paragraph (h), ratings ~~shall~~ **must** be granted following satisfactory completion of the relevant category B1, B2 or C aircraft type training approved by the competent authority or conducted by an appropriately approved Part-147 maintenance training organisation.

(d) Category B1 and B2 approved type training ~~shall~~ **must** include theoretical and practical training and consist of the appropriate course in relation to the 66.A.20(a) privileges. Theoretical and practical training ~~shall~~ **must** comply with Appendix III to this Part and shall have been started and completed within the three years preceding the application for a type rating endorsement.

Justification:

Most of the words "shall" are crosslined in red, replaced by "must" in blue, due to possible misinterpretations depending on who is reading and language barriers.

response *Not accepted*

In Part-66 requirements, the wording "shall" is used and for consistency this

wording should be maintained.

comment 87 comment by: *Nayak Aircraft Services*

(d)

1. In our opinion it much better to specify the timeframe fix to 5 years. We have seen in the past that a lot of students needs more than 3 years to grow up experience on large aircrafts.
2. The NAA must have the right to give rules for requalification on type training after this time limit.

response *Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

comment 96 comment by: *Luftfahrt-Bundesamt (LBA)*

(d)

This paragraph should be amended as follows:

(d) Category B1 and B2 approved type training shall include theoretical and practical elements and consist of the appropriate course in relation to the 66.A.20(a) privileges. Theoretical and practical training shall comply with Appendix III to this Part and shall have been started and completed within the **five years** preceding the application for a type rating endorsement.

Justification:

Part-145 organizations normally let their personnel go to the highest possible type training course standard because this allows them to be most flexible concerning work package and the chance to enlarge the responsibilities of the trained technician. To train personnel level by level will furthermore raise costs and the time the employer is occupied by training grows without any further affect concerning his skills. Therefore a technician should get the chance to get the best possible training, to grow within the Part-145 system and to enlarge competency e.g. to CAT B1 personnel at some time. The extended time period will support this without safety being affected from LBA's point of view.

response *Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and

168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

comment

113

comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

66.A.45 (d), Appendix III (g) and Appendix V (4)

The Swedish CAA suggests that the 3 year period should be amended to a 2 year period in which all the requirements for a complete type training or type examination including the required practical training must be obtained.

Justification:

The Swedish CAA considers this being a too long period for completing a type training. In our previous national system, we had a 2 year limit for the validity of a type training or type examination. Our experience is that this is a sufficient time.

We also think that this could be compared to that a certification authorization is valid for just 2 years, if not renewed.

response

*Not accepted*

Based on the comments, it is proposed to keep the three year validity. This timeframe is sensible. A "two year" period has been sometimes felt as too short.

Refer to paragraph 14 of the explanatory note (NPA)

The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

comment

136

comment by: *Zoltán PÁVEL*

(d)

I can not agree with the 3 years time limitation for the endorsement of type rating in the Part-66 licence without provision for acceptance of long period modular type training for aircraft maintenance personnel continuously working in Part-145 AMO environment. On the basis of my experience a 5 to 6 year time period is acceptable and feasible for such modular training. This provision may be given in the form of adding subparagraph (e) to 66.A.45. For example:

"Notwithstanding requirements of paragraph (d) category B1 and B2 approved type training may be organised for continuously employed maintenance personnel of Part-145 approved maintenance organisation on a modular basis. The modular training shall include theoretical and practical training and consist of the appropriate course in relation to the 66.A.20(a)privileges. Theoretical and practical training shall comply with Appendix III to this Part and shall be started and completed within five (or six) years preceding the type rating endorsement. For acceptance of such training the employer shall certify continuous employment of the applicant during the modular training."

Justification:

For the reason of feasibility and better selection on the basis of competence

assessment a lot of Part-145 AMOs use step by step training and authorisation of their employees. Those AMOs are interested in breaking type training courses (theoretical and practical

both) into modules and using their manpower in specialised areas with time-scheduled step by step extension. This way employees can gain high level of knowledge in a specialised subject area quickly (in some cases on more than one aircraft type in parallel) but can reach full type knowledge slowly. Career programs and training financing systems of AMOs are built on this foundation. Should the person have no right to gain the Part-66 type rating after such a long program (because of the time limit) a lot of vacancies of aircraft maintenance industry become unattractive. It is not a goal when there is a lack of qualified aviation workers all over Europe. It should be a common interest of Member States, authorities and aviation industry to keep the system feasible.

Furthermore, normally this personnel is continuously trained by AMOs keeping them up to date in their technical, legislation knowledge and experience during this long time period. As they work in the gradually extending sphere of activities they do not lose their knowledge but gain more of that. I think, there should be a provision for such long period (more than 3 years) modular type training programs included in the regulation.

In the case EASA considers this issue is covered by the conversion provisions of Part-66 relevant to conversion of authorisation privileges granted by approved maintenance organisations, some detailing explanation is required in AMC and GM to prevent from various understanding of regulation by competent authorities of the Member States. At the moment it is not clarified if such conversion may be done during first issue of Part-66 licences or also during amendments, extensions.

response

*Not accepted*

Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame. (for example, refer to comments n'113 and 168)

Refer to paragraph 14 of the explanatory note (NPA). The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

comment

145

comment by: CAA-NL

66.A.45 (d) ... should remain unchanged.

66.A.45 (f) Completion of approved aircraft type training, as required by paragraphs (b) to (e), shall be demonstrated by an theoretical examination and practical assessment. The examination shall comply with Appendix III to this Part. The examinations in respect of category B1 or B2 or C aircraft type ratings shall be conducted by training organisations appropriately approved under Part-147, the competent authority, or the training organisation conducting the approved type training course. The successful completion of theoretical and or practical training can be demonstrated by the issued certificate within two years of the issue date of the certificates recognition.

Justification:

66.A.45 (d)

- The period in which the type training should start and end is less relevant than the necessity to have up to date theoretical and practical knowledge.
- This is easier controlled by ensuring that the training is always up to date and that the application for a type rating is done within two years of the issuance of the certificate.
- This verification is much easier for the licensing officers.
- The period of two years is better in line with the requirement within the Part-145 organisation to get sufficient recurrent training each two year period. (145.A.35(d))
- The validity of type training applies also for the Cat C
- Both theory and practice shall be completed with the issuance of a certificate. Practical training certificates may be issued by Part-145 organisation and are valid for not more than 2 years.

response

*Not accepted*

Based on the many comments received, it is proposed to keep the three year validity to comply with the theoretical and practical elements of a type training. This timeframe is sensible. A "two year" period has been sometimes felt as too short.

Refer to paragraph 14 of the explanatory note (NPA)

The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

Experience to be gained in order to be qualified as certifying staff (Part 145-35) and in order to maintain the privileges, is a different issue and differs from the time limit frame for training (Part 66 type training endorsement).

comment

168

comment by: CAA - Denmark

(d)

Proposed change to new text "and shall have been started and completed within the **two years** preceding the application for type rating endorsement".

Justification:

A two years period are inline with 66.A.20 (b)(2) and 145.A.35(c) and (d) we find it relevant to have the same time frame for the type training period.

response

*Not accepted*

Based on the comments, it is proposed to keep the three year validity. This timeframe is sensible. A "two year" period has been sometimes felt as too short.

Refer to paragraph 14 of the explanatory note (NPA)

The "three year" validity would ensure a good safety level and is consistent

with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

resulting  
text

Refer to the resulting text at the end of the document, last comment (or last segment)

**B. Draft Opinions - I Draft Opinion Part-66 - 66.B.200 Examination by the competent authority**

p. 14-15

comment

36

comment by: *Airbus*

**AFFECTED PARAGRAPH:**

**66.B.200 Examination by the competent authority, Sub-paragraph (d)**

**PROPOSED TEXT:**

66.B.200 Examination by the competent authority, subparagraph (d)

In subparagraph (d) add the word "respectively" as underlined:

"Type training examinations and type examinations must follow the standard specified in Appendix III paragraph 3 and 4 respectively to this Part."

**JUSTIFICATION:**

We understand that Appendix III paragraph 3 is for type training examinations while paragraph 4 is for type examinations. However, all applicable sections of part 66 need to be considered as basis for the details in the Appendix. The proposed text is intended to improve clarity.

response

*Noted*

The agency understands the point but it is out of the remit of this NPA.

Nevertheless the comment will be passed to NPA 2007-07 (Privileges of B1/B2 - Type and group ratings - type training)

comment

67

comment by: *UK CAA*

**AFFECTED PARAGRAPH (*Specify clearly Paragraph Number*):**

66.B.200

**PROPOSED TEXT/ COMMENT:**

Change to 'Both Part-147 approved type rating examinations and type examinations for aircraft not requiring type training, must follow the standards specified in Appendix III paragraph 3 and 4 to this part'

**JUSTIFICATION:**

Current suggested wording ambiguous.

response

*Not accepted*

Part 147 organisations are not the sole companies performing type training examinations and type examinations.

NAAAs and Part 145 organisations when the course is approved by NAAAs may also perform type training examinations and type examinations.

comment

80 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

(a) All examination questions ~~shall~~ **must** be kept in a secure manner prior to an

examination, to ensure that candidates will not know which particular questions will form the basis of the examination. The competent authority shall nominate those persons who control the questions to be used for each examination.

(b) The competent authority ~~shall~~ **must** appoint examiners who ~~shall~~ **must** be present during all examinations to ensure the integrity of the examination.

(c) Basic examinations shall follow the standard specified in Appendix I and II to this Part.

(d) Type training examinations and type examinations must follow the standard specified in Appendix III paragraph 3 and 4 to this Part.

(e) New essay questions shall be raised at least every six months and used questions withdrawn or rested from use. A record of the questions used ~~shall~~ **must** be retained in the records for reference.

(f) All examination papers ~~shall~~ **must** be handed out at the start of the examination to the candidate and handed back to the examiner at the end of the allotted examination time period. No examination paper may be removed from the examination room during the allotted examination time period.

(g) Apart from specific documentation needed for type examinations, only the examination paper may be available to the candidate during the examination.

(h) Examination candidates ~~shall~~ **must** be separated from each other so that they cannot read each other's examination papers. They may not speak to any person other than the examiner.

(i) Candidates who are proven to be cheating ~~shall~~ **must** be banned from taking any further (...)

Justification:

Most of the words "shall" are crosslined in red, replaced by "must" in blue, due to possible misinterpretations depending on who is reading and language barriers.

response *Not accepted*

In Part-66 requirements, the wording "shall" is used and for consistency this wording should be maintained.

comment *81 comment by: SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

(i)... any further examination within ~~12~~ **36** months of the date of the examination in which they were found cheating.

Justification:

Cheating is wrong and may have very serious negative social impact. Penalties must be severe to encourage candidates not to cheat. With 36 months penalty, proficiency may be lost and candidates are encouraged not to cheat.

response *Not accepted*

This comment is out of the remit of this rulemaking task.

comment *146*

comment by: *CAA-NL*

66.B.200(d) should remain unchanged

Justification:

66.B.200(d) The competent authority conduct only examinations no training, hence it is unnecessary to mention training examinations, further more the addition of paragraph 3 and 4 in fact limits the applicability of Appendix III to those paragraphs were it should remain overall valid, since also 1 and 2 (the

	definition of levels and the syllabus table are relevant).
response	<p><i>Partially accepted</i></p> <p>First part of the comment: not accepted</p> <p>According to Part-66.A.45 (f) Completion of approved aircraft type training, as required by paragraphs (b) to (e), shall be demonstrated by an examination. The examination shall comply with Appendix III to this Part. The examinations in respect of category B1 or B2 or C aircraft type ratings shall be conducted by training organisations appropriately approved under Part-147, the competent authority, or the training organisation conducting the approved type training course.</p> <p>Second part of the comment</p> <p>Reference to Part 3 and 4 has been taken out.</p>

comment	<p>165 <span style="float: right;">comment by: <i>Malta Department of Civil Aviation</i></span></p> <p>(j) The competent authority shall review the examination questions in a systematic manner.</p> <p>Justification: The quality of the questions produced by the authorities shall be adequately controlled and checked internally. Experience from EASA Standardisation visits has shown that internal procedures and control is to say the least inadequate.</p> <p>Part-66.B.10 (c) makes reference to procedures for compliance with Part-66.</p>
response	<p><i>Noted</i></p> <p>The agency understands the point but it is out of the remit of this NPA. Nevertheless the comment will be passed to NPA 2007-07 (Privileges of B1/B2 - Type and group ratings - type training)</p>

resulting text	Refer to the resulting text at the end of the document, last comment (or last segment)
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<b>B. Draft Opinions - I Draft Opinion Part-66 - Appendix II Basic Examination Standard</b>	p. 15-16
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comment	<p>26 <span style="float: right;">comment by: <i>TYROLEAN AIRWAYS</i></span></p> <p>App II, 1.12</p> <p>1) Provisions should be made if someone: e.g. successfully passes the B1.1 exam but only is issued a Cat A AML (for experience reasons) and after (e.g.) 10 years the person applies for a Cat B1 AML the modules should still be valid (though no B1 AML was issued at time of exam)</p> <p>2) The exclusion of module 1,2,3,4, (8,9) seems to have been forgotten in this amended paragraph</p> <p>App II, 1.13</p> <p>Pls provide justification for the 2 year waiting penalty in a Pt-147 school against the 1 year for self starters for retaking failed modules (after 3</p>
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	attempts)
response	<p><i>Partially accepted</i></p> <p>1) Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism. Refer also to the resulting text.</p> <p>The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).</p> <p>As a consequence of the previous paragraph, there is no more need to consider whether a module is likely or unlikely to change over time. The sentence "with the exception of modules 1, 2 , 3 and 4" has been systematically taken out of the NPA because the continuous re-evaluation of the Part 66 appendix I syllabus will automatically lead to the re-assessment of the examination credits where a change of module content has occurred</p> <p>2) No more difference for a waiting period has been made between Part 147 and non Part 147 environment after three failed attempts.</p>
comment	<p>44 <span style="float: right;">comment by: <i>EAMTC</i></span></p> <p><b><u>PROPOSED TEXT:</u></b></p> <p>1.13 The maximum number of attempts for each module is three with one year waiting period after the third attempt. <del>for self starters and a two year period after the third attempt within a part-147 approved training course, before the next attempt.</del></p> <p><b>3. <u>JUSTIFICATION:</u></b></p> <p>We agree that a waiting period between 2 examination attempts is necessary; nevertheless the difference between self starter students and approved MTO's students is quite unfair for those who are trained in Part147 organisations, and for these organisations themselves. An approval should be beneficial, or neutral, but should never be detrimental. This difference would encourage students of approved MTOs to sit their exams as "self starters" in any case, to have a shorter waiting period if they fail.</p> <p>Besides, we think that without a centralized database EU Authorities would not be able to control if this new requirement is satisfied by students, as they are already unable to check the 90 days waiting period which is currently in force after a failed exam.</p>
response	<p><i>Accepted</i></p> <p>The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no</p>

more discrimination.

comment 46 comment by: *DGAC France*

Reword Part 66, Appendix II, B 1.13 as follows :

"The maximum number of attempts for each module is three with a one year waiting period after the third attempt ~~for self starters and a two year waiting period after the third attempt within a Part-147 approval basic training course;~~ before the next attempt."

There is no justification for the requirement of a longer waiting period for an applicant from a Part-147 training course Such a limitation may have the effect to discourage applicants to join a training course. There should be freedom for applicants to learn by themselves or to attend a 147 training course

response *Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

comment 54 comment by: *AgustaWestland*

We have the same opinion as our comments to draft 66.A.25.

Also, we suggest to replace the definition "all modules" with with "each individual module" as specified in 66.A.45(a).

response *Accepted*

The comment has been fully taken into account.

comment 55 comment by: *AgustaWestland*

It is not clear the reason why in 1.13 the waiting period after the third attempt has been differenciated between self starter and Part-147 basic courses participants. We feel that in such a case the second and third attempt would be undergone as a self starter crating ambiguity.

Considering the experience requirements under 66.A.30, if an applicant fails three time one module or more, the one year waiting period for self starters summed to the experience requirements and the time for exam preparation itself will push applicant over the 7 years time limit under draft opinion 66.A.25, the relative cost impact for applicants and the industry will be remarkable.

The three attempts for each module is going to be a dramatic restriction for the applicants.

response *Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

comment 57 comment by: *AgustaWestland*

It is not established who and how will monitor and record the number of subsequent attempts of each applicant.

Should each Part-147 notify to NAA, and each NAA shall notify to EASA for a centralized database of examination and applicants bio data? Should each Part-147 notify to EASA the examination with applicants bio data?  
 Will all Part147 have authorized access to the examination attempts database?  
 If an applicant fails an examination three times in one of the EASA Part-147 and make a fourth attempt in another one, eventually in another EASA country, who is going to be responsible, the Part 147, the NAA, EASA or the applicant?

response *Partially accepted*

So far, such a databank does not exist.

EASA is currently working on a future European databank.

Provisions have been added in Part-66 appendices II and III: the applicant shall confirm in writing to the organisation to which he applies for an examination, the number of attempts during the last year. The organisation will be responsible for checking the number of attempts within the applicable timeframes.

Cheating (when unveiled) will not favour the interests of the applicant.

comment 62

comment by: ENAC

This requirement cannot be checked, and the enforcement is unrealistic, since there is no central database. We suggest that the candidate should have the obligation to declare in writing to Part-147 organisations or to competent authorities to meet this requirement, prior to each examination.

response *Partially accepted*

So far, such a databank does not exist.

EASA is currently working on a future European databank.

Provisions have been added in Part-66 appendices II and III: the applicant shall confirm in writing to the organisation to which he applies for an examination, the number of attempts during the last year. The organisation will be responsible for checking the number of attempts within the applicable timeframes.

Cheating (when unveiled) will not favour the interests of the applicant.

comment 68

comment by: UK CAA

**AFFECTED PARAGRAPH**

Appendix II 1.12

**PROPOSED TEXT/ COMMENT:**

Contradiction between this reference and 66.A.25. Propose text 'The time period of 7 years applies to all modules, with the exception of modules 1, 2, 3 and 4 and those modules which were passed as part of another category of licence where that licence has already been issued.'

**JUSTIFICATION:**

response	<p>Contradiction between this reference and 66.A.25.</p> <p><i>Accepted</i></p> <p>The concept of validity for each "individual" module has been retained.</p>
comment	<p>69 <span style="float: right;">comment by: UK CAA</span></p> <p><b><u>AFFECTED PARAGRAPH:</u></b> Appendix II - New sentence [1.11]</p> <p><b><u>PROPOSED TEXT/ COMMENT:</u></b> Propose additional sentence: 'If an examination candidate enrolled on a Part-147 approved course fails an individual examination four times, it should be considered that this candidate has not met the required standard and must recommence the approved course.'</p> <p><b><u>JUSTIFICATION:</u></b> To prevent repeated long term re-examination where a candidate fails to meet the required level of understanding of the subject material.</p>
response	<p><i>Not accepted</i></p> <p>The agency prefers to leave the decision to the applicant whether he must recommence an approved course. The examination is the sanction.</p>
comment	<p>71 <span style="float: right;">comment by: Irish Aviation Authority</span></p> <p>Paragraph 1.11 All Part-66 modules that make up a complete Part-66 aircraft maintenance licence category or subcategory, with the exception of modules 1, 2, 3 and 4 must be passed within 7 years from the date of the application for the licence except in the case specified in paragraph 1.12.</p> <p>Paragraph 1.12 The 7 year time period does not apply to those modules which were passed as part of another category licence, where the licence has already been issued.</p> <p>Justification: The reference to the time period in paragraph 1.12 does not make sense because there is no other reference to a time period in Appendix II. (Another option is to take the new sentence from paragraph 1.12 and insert at the end of 66.A.25 paragraph (a)).</p>
response	<p><i>Accepted</i></p> <p>The concept of validity for each "individual" module has been retained.</p>
comment	<p>72 <span style="float: right;">comment by: Irish Aviation Authority</span></p> <p>Delete paragraph 1.13</p> <p>Justification: There are already adequate restrictions in relation to repeat examinations, 90 days for the self starter and 30 days where additional training is provide in a Part-147 training organisation and the new proposed requirement to gain the knowledge and experience within seven years. The Part-66 standard is not clearly defined in the Appendix 1 syllabus which,</p>

together with the lack of text books, means that the standard is actually determined by the questions. This is unfair on students and leads to high failure rates.

The 75% pass mark for the multi-choice examinations is a high standard and it is not unusual for students to frequently get 73% and 74% in examinations. If, after three such results in a module, the student is not permitted to re-sit the examination for one or two years he/she will, most likely, be greatly discouraged, if not totally disillusioned. Every effort should be made to encourage students to complete the examinations.

response *Not accepted*

This new proposed rule gives the applicant a ten year period to pass every module and gain experience: with a one year waiting period after every set of 3 failed attempts, the applicant will have the possibility to sit for examination at least 18 times in the ten year period, which is reasonably generous.

comment 83

comment by: *IAAG*

1.13 The maximum number of attempts for each module is three with one year waiting period after the third attempt. ~~for self starters and a two year period after the third attempt within a part 147 approved training course, before the next attempt.~~

Justification:

We agree that a waiting period between 2 examination attempts is necessary; nevertheless the difference between self starter students and approved MTO's students is quite unfair for those who are trained in Part147 organisations, and for these organisations themselves. An approval should be beneficial, or neutral, but should never be detrimental. This difference would encourage students of approved MTOs to sit their exams as "self starters" in any case, to have a shorter waiting period if they fail.

Besides, we think that without a centralized database EU Authorities would not be able to control if this new requirement is satisfied by students, as they are already unable to check the 90 days waiting period which is currently in force after a failed exam.

response *Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

comment 85

comment by: *Nayak Aircraft Services*

1.13

In our opinion EASA means that the student performed the examination at the same trainings organisation. That is in fact not in all cases.

Who is responsible for checking the timeframes ? NAA, Training Organisation or Student ?

response *Accepted*

Provisions have been added in Part-66 appendices II and III: the applicant shall confirm in writing to the organisation to which he applies for an

examination, the number of attempts during the last year. The organisation will be responsible for checking the number of attempts within the applicable timeframes.

Cheating (when unveiled) will not favour the interests of the applicant.

comment

94

comment by: *Anders Ljungstedts gymnasium*

1.12

The time period **of 10 years** applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now

described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

95

comment by: *Anders Ljungstedts gymnasium*

1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and **one year waiting** period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

102

comment by: ACS, Håsslögymnasiet

Paragraph 1.11

All Part 66 modules that make up a complete Part 66 aircraft maintenance licence category or subcategory must be passed within a 5 year time period of passing the first module except for the modules 1, 2, 3 and 4 and except in the case specified in paragraph 1.12. A failed module may not be retaken for at least 90 days following the date of the failed module examination, except in the case of a Part 147 approved maintenance training organisation which conducts a course of re-training tailored to the failed subjects in the particular module when the failed module may be retaken after 30 days.

Justification:

**ACS** Aviation College of Sweden supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This

will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)
- 1.5 years at the University
- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response *Noted*

refer to comment n'101

comment *103*

comment by: *ACS, Hässlögymnasiet*

Paragraph 1.12

The time period of 10 years applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

**ACS** Aviation College of Sweden supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)
- 1.5 years at the University
- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after

response

completion of their Certificate of Recognition.

*Accepted*

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

104

comment by: ACS, Häsrlögymnasiet

Paragraph 1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and one year waiting period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

**ACS** Aviation College of Sweden see no need to treat self starters or students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.

**ACS** supports the proposed regulation change to limit the time between issuing

the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)
- 1.5 years at the University
- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

112 ❖

comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

66.A.25 (a), (b), Appendix II 1.12 and Appendix V (4)

The Swedish CAA suggests that the 7 year period should be amended to a 10 year period in which all the requirements for qualification to a Part-66 AML must be obtained.

Justification:

All the basic training organizations in Sweden which are approved according to Part-147, is part of the Swedish public school system. This national system mandates all these schools to extend over 3 years. These 3 years must include a certain amount of compulsory subjects, which leads to that it is possible to contain the training up to Cat A in these 3 years. If someone wants to be trained up to Cat B1 or B2, this requires another year of training. This leads to that an applicant has got another 3 years left in which he/she must obtain the practical experience of at least 2 years. The Swedish CAA considers this giving the applicants a too small margin to obtain the required practical experience.

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

119

comment by: *Flygteknik Technical Training*

1.12

The time period **of 10 years** applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

Flygteknik Technical Training supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph

66.A.45(i)).

comment	<p><i>124</i> <span style="float: right;">comment by: <i>FAASA-CAENA</i></span></p> <p>1.13 The maximum numbers of attempts for each module is three with one year waiting period after the third attempt, before the next attempt.</p> <p>Justification: Self starters and Part-147 students should have the same opportunities.</p>
response	<p><i>Accepted</i></p> <p>The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.</p>
comment	<p><i>132</i> <span style="float: right;">comment by: <i>Flygteknik Technical Training</i></span></p> <p>1.13 The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and <b>one year waiting</b> period after the third attempt within a Part-147 approved basic training course, before the next attempt.</p> <p>Flygteknik Technical training se no need to treat self starters or students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.</p> <p>Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:</p> <p>2 years at the Upper Secondary School (if the first examination is passed in the end of year one)</p> <p>1.5 years at the University</p> <p>3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)</p> <p>All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.</p>

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

134 ❖

comment by: *Swedish National Agency for Education*

The Swedish National Agency for Education has been acquainted with a proposal of a NPA from EASA concerning Part-66 aircraft maintenance licence. In the NPA it is suggested that all practical and theoretical basic education shall be carried out within 7 years.

#### **Standpoint from the Swedish National Agency for Education**

In the Swedish school system a time limit of 7 years can cause problems for a student. The following will give an example why:

The student starts the education with the first module the second year (of three) at the upper secondary school. Some students even start the first year. Two (or three) years later the student finishes the upper secondary school. Some of the boys then have to make, at least, one year of military service.

After upper secondary school the student have to study 1 – 1½ year at a technical education to reach the level B1.

4 – 5½ years have now passed since the student started the first module.

After the technical education the student have to get a job to get two years qualifying practical training before the licence can be issued.

That means that the licence is issued 6 – 7½ years after the education begun, providing that the student doesn't fail in some modules or have difficulties to find a suitable job.

If there is need for a time limit The Swedish National Agency for Education consider that a limit of 10 years would be more adequate for the Swedish school system

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment

147

comment by: CAA-NL

Appendix II Basic examination standard

1.11. Part-66 modules 1,2,3,4 have an unlimited validity. All other modules have validity limited to seven years from the certificate date. This can be the certificate for an individual module or the certificate for a complete category training within a Part-147 approved organisation.

A failed module may not be retaken for at least 90 days following the date of the failed module examination, except in the case of a Part-147 approved maintenance training organisation which conducts a course of retraining tailored to the failed subjects in the particular module when the failed module may be retaken after 30 days.

1.12. The 7 year time period specified in paragraph 1.11 does not apply to those modules which are common to more than one Part-66 aircraft maintenance licence category or subcategory and which were previously passed as part of another such category or subcategory examination.

1.13 The maximum number of attempts for each module within the same organisation is three, with a one-year waiting period after the third attempt.

Justification:

Appendix II Basic examination standard

	<p>1.11. and 1.12 follows form proposed text 66.A.25. Note the importance of the wordt common in the text to indicate that not only the module needs to be part of the subcategory but also the required level shall be the same.</p> <p>1.13 There is no system in place to ensure that different organisations are aware of failed examinations in other organisations. The rationale for a two-year waiting period within an approved organisation is not clear.</p>
response	<p><i>Partially accepted</i></p> <p>1.11 As suggested, the text has been deleted in order to avoid duplication with 66.A.25</p> <p>1.12 Agreed. The resulting text has been modified accordingly.</p> <p>1.13: Provisions have been added in Part-66 appendices II and III: the applicant shall confirm in writing to the organisation to which he applies for an examination, the number of attempts during the last year. The organisation will be responsible for checking the number of attempts within the applicable timeframes.</p> <p>Cheating (when unveiled) will not favour the interests of the applicant.</p> <p>EASA is currently working on a future European databank that could solve that concern.</p>
comment	<p>154 <span style="float: right;">comment by: <i>British Airways Engineering</i></span></p> <p><i>1.13 The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and a two year waiting period after the third attempt within a Part-147 approved basic training course, before the next attempt.</i></p> <p>Proposed text:</p> <p><i>1.13 The maximum number of attempts for each module is three with a one year waiting period after the third attempt before the next attempt.</i></p> <p>Justification:</p> <p>This proposal will cause problems for some students in attaining all the required modules to become licensed Engineers within the timescales of Part-66 training. The number of modules and associated assessments results in some students taking more than three attempts before they pass examination modules.</p> <p>Having a difference in the waiting times, produces a dual standard, which discriminates against students within a Part-147 organisation. This could result in a student, who has modules to complete, leaving a training course in order to take those modules after one year rather than wait the required two years.</p>
response	<p><i>Accepted</i></p> <p>The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.</p>

comment

158

comment by: *Ulf LARSSON*

Paragraph 1.12

The time period of 10 years applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

I support the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the

national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

159

comment by: *Ulf LARSSON*

Paragraph 1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and **one year waiting** period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

I see no need to treat self starters or students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.

I support the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

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3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response *Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment *169*

comment by: *CAA - Denmark*

The deleted part of 1.11 and 1.12 must be active again. Delete the new proposed text " The time period of 7 years applies to all modules, except for those modules which were passed as part of another category license, where the license has already been issued" .

Justification:

Denmark find the approach that only theoretical learning( examination) will ensure a good safe level wrong, as the practical part of a learning process are ignored. Se also comments on 66.A.25(a)(b).

response *Partially accepted*

1.11 The text was deleted in order to avoid duplication with 66.A.25.

1.12 This paragraph has been corrected according to the new proposal.

comment 170 comment by: CAA - Denmark

In 1.13 The maximum number of attempts for each module is three with **two years** waiting period after the third attempt for **self starter** and a **one year** waiting period after the third attempt within a **part 147 approved basic training** course, before next attempt.

Justification:

The period for the controlled environment (147) we suggest one year and two years for a non controlled environment.

response *Partially accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

comment 176 comment by: Priority Aero Maintenance AB

Paragraph 1.12

The time period **of 10 years** applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

Priority Aero Maintenance AB supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

response

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

177

comment by: *Priority Aero Maintenance AB*

Paragraph 1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and **one year waiting** period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

Priority Aero Maintenance AB training se no need to treat self starters or

students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

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All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
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- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

181

comment by: *Flygarbetsgivarna*

Paragraph 1.12

The time period of 10 years applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

Flygarbetsgivarna supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

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3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66

Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

182

comment by: *Flygarbetsgivarna*

Paragraph 1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and **one year waiting** period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

Flygarbetsgivarna se no need to treat self starters or students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This

will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

186

comment by: *Nordiskt FlygTeknikCentrum AB*

Paragraph 1.12

The time period **of 10 years** applies to all modules, except for those modules which were passed as part of another category licence, where the licence has already been issued.

Justification:

Nordiskt FlygTeknikCentrum supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.  
Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this

proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

187

comment by: *Nordiskt FlygTeknikCentrum AB*

Paragraph 1.13

The maximum number of attempts for each module is three with a one year waiting period after the third attempt for self starters and **one year waiting** period after the third attempt within a Part-147 approved basic training course, before the next attempt.

Justification:

Nordiskt FlygTeknikCentrum se no need to treat self starters or students in a Part 147-organization in different manners and therefore propose a one year waiting period after the third attempt regardless if the student has studied by himself or within a Part 147 organization. This will further simplify the application of the regulations since the time limit is the same regardless of if the student is a self starter or not.

Nordiskt FlygTeknikCentrum supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in

	<p>Sweden, the time has to be extended from 7 years to 10 years.</p> <p>The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.</p>
response	<p><i>Accepted</i></p> <p>The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.</p> <p>Provisions for non retroactivity (grandfathering rights).</p> <p>For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.</p> <ul style="list-style-type: none"> <li>• Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));</li> <li>• Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));</li> <li>• Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).</li> </ul>

resulting text	Refer to the resulting text at the end of the document, last comment (or last segment)
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<b>B. Draft Opinions - I Draft Opinion Part-66 - Appendix III Type training and Examination Standard</b>	p. 16
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comment	<p>27 <span style="float: right;">comment by: <i>TYROLEAN AIRWAYS</i></span></p> <p>App III Why is the certificate layout named "Example of ..." ? This will lead training organisations to deviate from the defined form and to individual information where standarisation should be the target.</p>
response	<p><i>Accepted</i></p> <p>The words "example of" have been taken out and the resulting text is now: "Training Certificate"</p>
comment	<p>28 ❖ <span style="float: right;">comment by: <i>Benjamin KIRBY</i></span></p>

I wish to voice a concern over the proposal to limit the number of exam attempts by prospective Part 66 AML holders to 3 attempts before a mandatory 12 month waiting period before the candidate may retake a Module exam having failed to pass the exam in those attempts. Specifically the content of the Draft Opinion section IV, Para 14 point 7, and Draft Opinions Part 66 Appendix 2 Para b 1.13. My comments and justification are as follows:

I feel that this step is unnecessary, unfair, and unjustified for the safe training and qualification of competent Licensed Technicians. I am particularly against this proposal in regard to those candidates who repeatedly fail to pass Module Exams for Module 11 and 13, the enormous possible subject matter covered in these modules makes it highly likely that several attempts will be required by the majority of candidates to pass this exam. Many candidates, (certainly those who choose the self study while working within the industry path), will take an exam before refining the direction of their studies, purely to get a feel for the questions and the range of the required knowledge. This will normally result in the first failed attempt. For many in the industry a license is a means of career progression. Preventing repeated 'failers' from taking exams for an entire year having already restricted them to a three month wait between re-sits will no doubt result in a further reduction in an already understaffed skilled workforce and have a detrimental affect on aviation safety.

Part of your justification is that "*Maximum "three attempts" rule is consistent with some Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003*" If this is the case then there must be Member States where there was not this rule. In looking to improve the licensing systems in your consultations can you not be justified in following the Member States with the less restrictive ruling?

You also state as justification that; "*It is commonly accepted that three consecutive failed attempts questions the ability of the trainee to pass exams and to succeed in this field.*" This maybe a valid point for those attending a full time academic, 'Ab-Initio', training course, but in the case of Mechanics and Technicians already holding positions and qualifications within the Industry to question a person's abilities to fulfil the duties and privileges of an AML holder on the basis that they failed to pass a difficult and complex exam is not correct. Furthermore to base the requirements for Maintenance personnel training and qualifications on the philosophy and criteria of Flight Crew [Para 15 ... "*These new limitations are consistent with the philosophy and the existing criteria as proposed by JAR-FCL 1(\$1.490 "pass standards" and \$1.495 "acceptance period")*], may cause failings in achieving the required standards for a very different professional discipline.

(These comments are my own personal views and not as a representative of any other person, body, or organization).

response

*Not accepted*

This new proposed rule gives the applicant a ten year period to pass every module and gain experience: with a one year waiting period after every set of 3 failed attempts, the applicant will have the possibility to sit for examination at least 18 times in the ten year period, which is reasonably generous.

comment

39

comment by: AEROK

4.(e) There is a common practice during the theoretical part of the type training organising examination in every one-two weeks instead of a big final examination at the end of the course.

This "sub-examination" practice ensures getting the necessary knowledge level (75% minimum requirement) on every ATA chapter while in case of a

"big-final-examination" the applicant may leave out some "dislike" topics. (From 150-200 test question the allowed 25% failed part may content a complete system!)

Also the "sub-examination" is a good practice to keep the high motivation of the trainees during a long, fatiguing course from one side and from the other side the instructors can get a realistic feedback about the efficiency their work during the course. In this case the second attempt of exam acceptable after two days (minimum 48 hours are fairly enough for re-learning the failed topics) with an all-new test sheet of course. The third attempt may do after the last day of the course theoretical part, and we suggest a time limit for it. Under six months the trainee should have passed all sub-examination.

4.(f) The passed type examination should be valid as far the applicant takes part on continuation training.

4(g) The Appendix III. 4(g) requirement for two examiners presence during any examination is not acceptable for us. The NPA does not mention any background information for this changing. It is not understandable what kind of problems caused this suggestion, what would be the benefit of this modification.

Our opinion is that the existing system: the established training and examination procedures, the quality control system, the examiners as they are approved by NAA-s and as all critical moments are documented and *audited* – is far enough to keep the level of consistency high. (In a small organisation the whole permanent staff is involved in the training – it seems a luxury expense the employment of somebody only for supervision of examination – especially in courses far from the basic location of the training organization.)

response

*Accepted*

Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.

Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.

comment

45

comment by: *DGAC France*

Delete Part 66, appendix III, §4 (g)

The idea to have an examiner independent of the candidate may be good, but is not always feasible. To even go further and to add a second examiner is disproportionate and is not compatible with the number of examiners available in this field of activity. In addition this NPA was only supposed to deal with the question of time limit for demonstrating compliance with knowledge requirement and experience requirements and not with the question of examiners. There is no slightest justification for this requirement and no impact assessment

response

*Accepted*

Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.

Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.

comment	47	comment by: <i>DGAC France</i>
	<p>Modify Part 66, appendix III, paragraph 4 (e) as follows :</p> <p>(e) "<del>The maximum number of attempts is After three attempts, with</del> a one year waiting period <u>is required after the third attempt</u>, before the next attempt. Failed examination may not be retaken for at least 90 days following the date of the failed "</p> <p>Clarification: the initial text seems to imply there is maximum three attempts total, but it is only three attempts in a row, before the candidate spends one year to improve deeply and start again. It seems more appropriate to concentrate on the idea of a one year waiting period as subject of sentence, as proposed here above. This paragraph should not be numbered (e) as it is not an examination objective as (a) to (d) above.</p>	
response	<i>Accepted</i>	
	<p>The difference for a waiting period between Part 147 and non Part 147 environment after three failed attempts has been deleted; there is no more discrimination.</p>	
comment	48	comment by: <i>DGAC France</i>
	<p>Modify Part 66, appendix III, paragraph 4 (f) as follows :</p> <p>(f) The passed type examination is valid for three years <u>for type training endorsement on the licence</u> after which it has to be redone.</p> <p>The purpose of those three years that determines the validity of the type examination shall be included in the sentence for clarity as proposed. This paragraph should not be numbered (f) as it is not an examination objective as (a) to (d) above.</p>	
response	<i>Accepted</i>	
	<p>The comment has been fully taken into account in the resulting text.</p>	
comment	50	comment by: <i>Swiss Federal Office of Civil Aviation (FOCA)</i>
	<p>Concerning the content of the draft opinion, "Appendix III, Type training and Examination Standard, Paragraph 4. (e), we observed a little fault. Instead of "(e) The maximum number of attempts is three with a one year waiting period after the <b>third</b> attempt [...]" it should read "(e) The maximum number of attempts is three with a one year waiting period after the <b>second</b> attempt [...]"</p>	
response	<i>Partially accepted</i>	
	<p>The resulting text has been re-written in a way that there is no more confusion.</p>	
comment	56	comment by: <i>AgustaWestland</i>
	<p>As commented for draft opinion on 66.A.45, the three years validity period for type examination will have cost repercussion for the industry.</p>	
response	<i>Not accepted</i>	
	<p>Introducing a three year validity period (before applying for the licence) to</p>	

comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame (for example, refer to comments n'113 and 168).

comment 63

comment by: ENAC

**Appendix III, paragraph 4 (e) Basic examination standard:** this requirement cannot be checked, and the enforcement is unrealistic, since there is no central database. We suggest that the candidate should have the obligation to declare in writing to Part-147 organisations or to competent authorities to meet this requirement, prior to each examination.

**Appendix III, paragraph 4 (f) Basic examination standard:** same comment as for 66.A.45(d).

**Appendix III, paragraph 4 (g) Basic examination standard:** this requirement should be applicable only for Part 147 organisations. We suggest to delete the requirement if the examiner belongs to the staff of a competent authority, specially if we are talking about single piston engine airplane or helicopters.

response Noted

So far, such a databank does not exist. EASA is currently working on a future European databank.

Provisions have been added in Part-66 appendices II and III: the applicant shall confirm in writing to the organisation to which he applies for an examination, the number of attempts during the last year. The organisation will be responsible for checking the number of attempts within the applicable timeframes.

Cheating (when unveiled) will not favour the interests of the applicant.

Examination criteria should be the same for every organisation, NAAs, Part 147 training providers, etc

comment 70

comment by: Irish Aviation Authority

Paragraph 4(g)

Oral type examinations shall be performed with two examiners present.

Justification:

Paragraph 4 states that 'where type training is not required, the examination must be oral, written or practical assessment based or a combination thereof'. There would be no need for two examiners to be present for a written examination.

response Noted

It is left to the organisation's decision: practical examination could be also conducted by two examiners.

Some alleviation in the new proposal has been given in the case of two examiners and it is better described when a second examiner is recommended.

comment	<p>74 <span style="float: right;">comment by: <i>dba Luftfahrtgesellschaft mbH</i></span></p> <p>Completely disregard item 4. Justification: The number of two examiners for aircraft types which do not require a type training is too high and does not correspond with JAA FCL § 1.240 where only one examiner is required.</p>
response	<p><i>Accepted</i></p> <p>Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.</p> <p>Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.</p>
comment	<p>76 <span style="float: right;">comment by: <i>Lufthansa Technik AG</i></span></p> <p>Para 4 (e) Change the second sentence to:</p> <p><b>"In case of third attempt</b> failed examination may not be retaken for at least 90 days following the date of the failed examination."</p> <p>Justification: We don't want to be time-limited for the second attempt of re-examination (due to a/c availability, etc).</p>
response	<p><i>Partially accepted</i></p> <p>This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required). The new proposed rule will ask for a 30 day waiting period between the first attempt and the second one, then a 60 day waiting period between the second and the third attempt. Therefore , some allevaition to the rule has been given.</p>
comment	<p>84 <span style="float: right;">comment by: <i>Nayak Aircraft Services</i></span></p> <p>4(g) In our opinion it is not necessary to have two (2) examiners. On all JAR FCL Examinations (1.240 App.3 or 1.475) there is only one examiner required. If the student fails on examination he itself can take options. The same examiner or a other one. The Option is noted on the respective FCL Form.</p>
response	<p><i>Accepted</i></p> <p>Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.</p> <p>Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.</p>

comment	<p>97 <span style="float: right;">comment by: <i>Luftfahrt-Bundesamt (LBA)</i></span></p> <p>Paragraph 4, Subpart f of Appendix III to Part-66 should be amended as follows:</p> <p>4. Type examination standard</p> <p><b>(f) The passed examination is valid for five years after which current knowledge has to be shown in a way sufficient to the competent authority.</b></p> <p>Justification: Concerning the five years validity please refer to comment to Part-66-A.45 (d) above.</p> <p>Because it is under the responsibility of the Part-145 organization to ensure current practical experience anyway, there are a reasonable number of possibilities to ensure sufficient knowledge after the exam becomes invalid. For example a documented brief introduction by a license holder acceptable to the competent authority or a refresher course will ensure an equivalent safety standard.</p>
response	<p><i>Not accepted</i></p> <p>Introducing a three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training is not considered to be too short. A timeframe has been well understood by the community as no other comments of this nature have been received with this CRD. Instead of extending, some commentators in this current CRD would like to shorten the overall time frame (for example, refer to comments n'113 and 168).</p> <p>Additionally, training objectives (Part 66) should not be compared with certifying staff requirements (Part 145-35): refer to sub-paragraph 14 of this current CRD (Explanatory notes)</p>
comment	<p>113 ❖ <span style="float: right;">comment by: <i>Swedish Civil Aviation Authority (Luftfartsstyrelsen)</i></span></p> <p>66.A.45 (d), Appendix III (g) and Appendix V (4)</p> <p>The Swedish CAA suggests that the 3 year period should be amended to a 2 year period in which all the requirements for a complete type training or type examination including the required practical training must be obtained.</p> <p>Justification: The Swedish CAA considers this being a too long period for completing a type training. In our previous national system, we had a 2 year limit for the validity of a type training or type examination. Our experience is that this is a sufficient time.</p> <p>We also think that this could be compared to that a certification authorization is valid for just 2 years, if not renewed.</p>
response	<p><i>Noted</i></p> <p>Refer to comment n'168</p>

comment	<p><i>114</i> comment by: <i>Swedish Civil Aviation Authority (Luftfartsstyrelsen)</i></p> <p>2042/2003 Annex III, Appendix III (g)</p> <p>The Swedish CAA suggests that it is not always required to have two examiners present at a type examination.</p> <p>Justification: It would be a great burden for the NAAs to always have two examiners present at the examinations they conduct. It would require the NAA to employ more staff, which of course in the end would have to be paid by the applicant. However if our proposal should be disregarded, the last sentence in the paragraph (A written report must be made by the examiner to explain ..... ) should be amended to reflect the fact that there are two examiners involved in the examination. It is our opinion that both examiners must agree to the result of the examination, and consequently both must sign it.</p>
response	<p><i>Accepted</i></p> <p>Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.</p> <p>Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.</p>
comment	<p><i>125</i> comment by: <i>FAASA-CAENA</i></p> <p>4(f)</p> <p>The passed type examination is valid for three years after which it has to be redone, if work experience is not presented.</p> <p>Justification: It is not necessary repeated a type examination, if a person is working in the corresponding task.</p>
response	<p><i>Partially accepted</i></p> <p>The passed type examination is now valid for 3 years for type training endorsement on the licence, after which it has to be redone, if practical experience is not demonstrated.</p>
comment	<p><i>127</i> comment by: <i>AEA</i></p> <p><i>(e) The maximum number of attempts is three with a one year waiting period after the third attempt, before the next attempt. Failed examinations may not be retaken for at least 90 days following the date of the failed examination.</i></p> <p>Change the second sentence to: <b>"In case of third attempt failed examinations may not be retaken for at least 90 days following the date of the failed examination."</b></p> <p>Justification: Airlines would not want to be time-limited for the second attempt of re-examination (due to a/c availability, etc).</p>

response

*Partially accepted*

This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required).

The new proposed rule will ask for a 30 day waiting period between the first attempt and the second one, then a 60 day waiting period between the second and the third attempt.

Therefore, some alleviation to the rule has been given.

comment

128

comment by: AEA

*"g) Type examination shall be performed with two examiners present. Furthermore, for re-examination, at least one examiner should be changed. At least one examiner shall not have been involved in the training of the applicant."*

*The sentence under Appendix 4 Paragraph 4(g) shall be deleted*

Justification:

Examiners pass through a personal acceptance by the competent Authority through an EASA Form 4 (Ref. 147.A.105(g) / AMC to 147.A.105 (b) and (g) / GM to 147.A.105(g)). Such acceptance passes through the evidence that Examiner must "have a responsible attitude to the conduct of examination such that the highest integrity is ensured". Duplicating the number of examiner and imposing the fact that at least one examiner shall not have been involved in the training of the applicant, can lead to doubt on integrity of such Examiner. Differently, it has to be ensured the independence between Examiner and the Trainer.

response

*Partially accepted*

The intent of this proposal was not to question the credibility of the examiner. It may appear that for some reasons, one examiner may have been involved in the training or one examiner is not competent in a certain domain. This is why the rulemaking group proposed certain provisions.

Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.

Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.

comment

148

comment by: CAA-NL

Insert a new subtitle before condition e) to g) for example the following restrictions apply to the examinations

e) The maximum number of attempts within the same organisation is three with a one year waiting period. Failed type examinations may not be retaken; for the second attempt within 24 hours for the third (and last) attempt within 30 days.

f) The certificate of completion of (all) type examination will remain valid for two years..

g) Type examination shall be performed with at least one examiner present. . It is recommended to have one or more additional surveyors present and use different surveyors and/or examiners for next attempt. Examinations shall be objective. In case instructors are also used as examiner additional action is required to ensure objective examinations.

Justification:

Appendix III e) to g) are no objectives. Adding a subtitle might correct this.

e) The maximum number of attempts, for the same reason as for basic examination this should be limited to the same organisation.

The waiting period used for basic examinations is much too long for type training. Many organisations are confident that a first resit at short notice is acceptable. The second should also be in a reasonable timeframe to allow companies to get sufficient qualified personnel.

f) It is much easier (more practical) to verify that the validity date on the certificate has not expired, than to verify that the course has started and finished in a certain time frame. The validity should be set at two years in stead of three, from the date the certificate is issued, to be in line with the recurrency training requirements in part 145. (If it is decided that, that it remains necessary to check that the starting date is within the past three years, it is not necessary to verify that the course is finished within three years.)

g) Especially with type training for smaller aircraft at remote locations will make it difficult (and expensive) to have two examiners present. There are also other methods two ensure that examinations are carried out properly, such as separation empty room separate papers etc. It therefore is suggested to add a statement that 'some' action shall be taken in case the instructor is also the examiner. Procedures for this will be approved through the MTOE approval.

response

*Partially accepted*

A subtitle has been added

This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required).

The new proposed rule will ask for a 30 day waiting period between the first attempt and the second one, then a 60 day waiting period between the second and the third attempt.

Therefore, some alleviation to the rule has been given.

comment

155

comment by: *Eurocopter Training Services*

(g) Type examination shall be performed in accordance with approved MTO procedure in the respect of the following rules:

- 1 examiner is required for at least one of the following conditions:
- o a maximum number of trainees below or equal to 14 trainees

- o type examination performed under a secure computerized system
- 2 examiners are required if the previous conditions are not met.

For re-examination, the same examiner can be concerned.

Exam process shall be implemented in accordance with the requirements depicted in the PART147.A.100 (b) (2).

Justification:

In accordance PART147.A.105 (g) and PART 147.A.135 (a) (b) (c) requirements, the examiner must comply with the depicted rules under the approved Maintenance Training Organization accountability.

Examiners are not involved in the examination failure. They don't have to be changed in case of re-examination.

response

*Accepted*

This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required).

However the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.

Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.

comment

171

comment by: CAA - Denmark

4(g) new text:

Type examination shall be performed by an approved type examiner or the competent authority. For re-examination a new examiner must be nominated. The examiner becomes disqualified if he/she has been involved in the training of the applicant for which the examination is held.

Justification:

Denmark finds it is an overkill to use two examiner. A good practice would be to have a representative (teacher/supervisor) from the 145, MF or 147 organisations and one examiner dedicated the examination.

response

*Partially accepted*

Where type training is not required, the presence of 2 examiners during type examination has been abandoned, due to a lack of competent human resources, especially among the competent authorities.

Nevertheless, it is confirmed that the examiner shall not have been involved in the candidate's training.

comment

172

comment by: CAA - Denmark

4(f)  
The passed type examination is valid for *two years* after which it has to be redone.

Justification:  
To be inline with 66.A.20 (b)(2) and 145.A.35(c) and (d).

response *Not accepted*

This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required).

Introducing a 2 year validity period (before applying to the licence) for the passed type examination will be considered too short: some comments confirm it.

The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

This timeframe is sensible.

Additionally, training objectives (Part 66) should not be compared with certifying staff requirements (Part 145-35).

resulting text Refer to the resulting text at the end of the document, last comment (or last segment)

**B. Draft Opinions - I Draft Opinion Part-66 - Appendix V Application Form and Example of Licence Format**

p. 17

comment 29 comment by: *TYROLEAN AIRWAYS*

In the case an applicant holds a license in another state and the statements are crossed out (as recommended by EASA) many member states do not issue a license!

Therefore the statements item 1 - 3 of the application Form 19 should be removed or reworded to:

If applicable tick and sign the following:

1. "I am holding a Pt-66 AML in another member state"
2. "I have applied ...."
3. "I had a Pt-66 AML revoked or .....

response *Noted*

This comment is out of the remit of this rulemaking task.

comment 64 comment by: *ENAC*

Application Form: to be amended if some of the comments are accepted.

response *Noted*

comment 73 ❖ comment by: *dba Luftfahrtgesellschaft mbH*

... and shall have been started and completed within the five years preceding the application for a type rating endorsement.

... I have completed the relevant type training within the preceding 5 years from the date of this application.

Justification:

The validity of a type training should be extended to a minimum of 5 years as applicants may need more than three years to complete education and gain appropriate knowledge related to their function as Certifying Staff.

The NAA should be authorised to decide about the necessity of further qualification measures regarding type training after this five years period.

response *Not accepted*

Refer to comment n°96

Furthermore, there will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

comment

75

comment by: *dba Luftfahrtgesellschaft mbH*

Completely disregard item 4.

Justification:

In case an application is made after all qualification measures have been accomplished, knowledge gained by the applicant earlier will no longer be accepted by the NAA, which means 66.A.45 is fully disregarded (credits).

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

comment

86

comment by: *Nayak Aircraft Services*

4

In our opinion it is not possible that the NAA granted for Reduction under National Rules (see LBA Bonuspunkte) if the Application sending after completion of all paperwork.

response

*Noted*

comment

91

comment by: *Anders Ljungstedts gymnasium*

4.

I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the preceding 10 years from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as

required by Part-66 within the preceding 3 years from the date of this application

Justification:

Anders Ljungstedts Gymnasium supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph

66.A.45(i)).

comment

98

comment by: *Luftfahrt-Bundesamt (LBA)*

Form LBA's point of view the proposed amendment of Form 19 should not be mentioned which leaves the Form unchanged.

Justification:

The proposed declaration doesn't course any benefit at all. According to Part-66.B.100 the competent authority has to ensure that any applicant for an AML fulfills all standards given by Part-66 anyway. A written statement on the application form does not affect this paragraph. Furthermore such a statement will hinder the competent authority as well as the applicant in finding the best way getting a license. In many cases it is not easy to see what kind of approved course an applicant has to pass. The question whether an apprenticeship or technical profession leads to bonus points according to Part-66.A.25 (b) may show one difficulty. The competent authority will decide this based on documents brought by the applicant. These documents are of the same scope as they will be at the time of application. The benefit for the competent authority is less than zero because all documents have to be done once more by the time the application has to be processed. For the applicant the proposed change will lead to an unsatisfactorily situation because he has to invest time and money before he may apply for an AML. To get information in advance he has the same scope of work as shown above for the competent authority. Therefore again there is no benefit if he can't apply for a license.

Furthermore there isn't any impact on the safety level at all because no additional information will be raised out of this statement.

To sum it up this change will raise costs for applicants and the competent authority, will enlarge the work load and won't improve the safety standard at all.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

comment

105

comment by: *ACS, Hässlögymnasiet*

4. I have completed all practical and theoretical aspects for the basic training licence category / sub-category required by Part-66 within the preceding 10 years from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experieince for the extension of my licence with a new type raiting as required by Part-66 within the preceding 3 years from the date of this

application

Justification:

**ACS** Aviation College of Sweden supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

- 2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

- 1.5 years at the University

- 3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case. To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment *112* ❖ comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

66.A.25 (a), (b), Appendix II 1.12 and Appendix V (4)

The Swedish CAA suggests that the 7 year period should be amended to a 10 year period in which all the requirements for qualification to a Part-66 AML must be obtained.

Justification:

All the basic training organizations in Sweden which are approved according to Part-147, is part of the Swedish public school system. This national system mandates all these schools to extend over 3 years. These 3 years must include a certain amount of compulsory subjects, which leads to that it is possible to contain the training up to Cat A in these 3 years. If someone wants to be trained up to Cat B1 or B2, this requires another year of training. This leads to that an applicant has got another 3 years left in which he/she must obtain the practical experience of at least 2 years. The Swedish CAA considers this giving the applicants a too small margin to obtain the required practical experience.

response *Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment *113* ❖ comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*

66.A.45 (d), Appendix III (g) and Appendix V (4)

The Swedish CAA suggests that the 3 year period should be amended to a 2 year period in which all the requirements for a complete type training or type examination including the required practical training must be obtained.

Justification:

The Swedish CAA considers this being a too long period for completing a type training. In our previous national system, we had a 2 year limit for the validity of a type training or type examination. Our experience is that this is a sufficient time.

We also think that this could be compared to that a certification authorization is valid for just 2 years, if not renewed.

response

*Not accepted*

This paragraph only applies to type examination where type training is not required (it does not concern large aircraft or complex aircraft where type training is required).

Introducing a 2 year validity period (before applying to the licence) for the passed type examination will be considered too short: some comments confirm it.

The "three year" validity would ensure a good safety level and is consistent with Member State national systems in place prior to the JAA and EC regulation 2042/2003.

This timeframe is sensible.

Additionally, training objectives (Part 66) should not be compared with certifying staff requirements (Part 145-35).

comment

118

comment by: *Flygteknik Technical Training*

4. I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the **preceding 10 years** from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as required by Part-66 within the preceding 3 years from the date of this application

Justification:

Flygteknik Technical Training supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is

in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

134 ❖

comment by: *Swedish National Agency for Education*

The Swedish National Agency for Education has been acquainted with a proposal of a NPA from EASA concerning Part-66 aircraft maintenance licence. In the NPA it is suggested that all practical and theoretical basic education shall be carried out within 7 years.

#### **Standpoint from the Swedish National Agency for Education**

In the Swedish school system a time limit of 7 years can cause problems for a student. The following will give an example why:

The student starts the education with the first module the second year (of three) at the upper secondary school. Some students even start the first year. Two (or three) years later the student finishes the upper secondary school. Some of the boys then have to make, at least, one year of military service.

After upper secondary school the student have to study 1 – 1½ year at a technical education to reach the level B1.

4 – 5½ years have now passed since the student started the first module.

After the technical education the student have to get a job to get two years qualifying practical training before the licence can be issued.

That means that the licence is issued 6 – 7½ years after the education begun, providing that the student doesn't fail in some modules or have difficulties to find a suitable job.

If there is need for a time limit The Swedish National Agency for Education consider that a limit of 10 years would be more adequate for the Swedish school system

response *Accepted*

The time limit for modules and examination credits is now increased from 7 to 10 years.

Refer to the explanatory note of the CRD , sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.

Refer also to the resulting text.

The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).

comment *149*

comment by: *CAA-NL*

Appendix V Application form.

4. can be left out.

Justification:

Statement 4. can be left out if the validity of certificates is limited.

response *Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

Refer also to comment n°150.

comment *160*

comment by: *Ulf LARSSON*

4. I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the **preceding 10 years** from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from

the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as required by Part-66 within the preceding 3 years from the date of this application

Justification:

I support the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Partially accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.

Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of

this Opinion (new paragraph 66.A.25(c));

- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

162

comment by: TAG Farnborough Engineering

Paragraph 4

'I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part 66 within the preceding 7 years from the date of this application'.

Justification:

Does this paragraph imply that all experience / training gained before the 7 years preceding the date of application on Form 19 is not valid? This could be relevant if the Engineer has passed all of the licence modules within the past 7 years, however he has gained the required practical experience over a longer time period.

response

Noted

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.  
Therefore paragraph 4 to Form 19 has been taken out.

Experience requirements are described in Part-66.A.30 and it has been added that the required experience shall have been started and completed within the 10 years preceding the application for an AML.

comment

173

comment by: CAA - Denmark

Delete in para 4: " within the preceding 7 years from the date of application".

Change in para 4: " 3 years to 2 years.

Justification:

See justification to 66.A.25 (comments 166 & 167)

response

Noted

Refer to comments n°166 and n°167

comment

178

comment by: Priority Aero Maintenance AB

4. I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the preceding 10 years from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as required by Part-66 within the preceding 3 years from the date of this application

Justification:

Priority Aero Maintenance AB supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.  
Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment

183

comment by: *Flygarbetsgivarna*

4. I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the preceding 10 years from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as required by Part-66 within the preceding 3 years from the date of this application

Justification:

Flygarbetsgivarna supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small

chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition

response *Noted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.  
Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph 66.A.45(i)).

comment 188

comment by: *Nordiskt FlygTeknikCentrum AB*

4. I have completed all the practical and theoretical aspects for the basic licence category / sub-category required by Part-66 within the **preceding 10 years** from the date of this application

and/or

I have completed the relevant type training within the preceding 3 years from the date of this application

and/or

I have completed the relevant type examination (Part -66.A.45(h)) and practical experience for the extension of my licence with a new type rating as required by Part-66 within the preceding 3 years from the date of this application

## Justification:

Nordiskt FlygTeknikCentrum supports the proposed regulation change to limit the time between issuing the Certificate of Recognition (CoR) for a Basic Training to the AML is issued. In the Swedish school system the students finish the Compulsory School at an age of 16. The Upper Secondary School is 3 years long and all Swedish Part-147 Basic Training schools has implemented the category A training into the Upper Secondary School. The students who are aiming for category B will have to study for another 1.5 to 2 years at the university. For a category B the students has to gather practical training for 3-5 years depending on what type of Certificate of Recognition they have. This will in best case be as follows:

2 years at the Upper Secondary School (if the first examination is passed in the end of year one)

1.5 years at the University

3 years at a Part-145 organization (if the student managed to get a Basic Training CoR)

All together this will be 6 and a half year and the student have a very small chance to have the AML issued before the first examination will expire. This is in the best case.

To give the Swedish students a fair chance, due to the school system in Sweden, the time has to be extended from 7 years to 10 years.

The students, who started their education before 2007, should have "Grandfathers right" or allow 7 years to gather the practical training after completion of their Certificate of Recognition.

response

*Accepted*

There will be no changes for Form 19. Form 19 will remain as it stands in the current regulation.  
Therefore paragraph 4 to Form 19 has been taken out.

Provisions for non retroactivity (grandfathering rights).

For fairness, it has been decided to introduce provisions for the applicants who started to pass basic knowledge examinations, type training examinations or gained experience or got examination credits before the entry into force of this proposed regulation.

- Basic knowledge examinations and examination credits passed/granted before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.25(c));
- Experience gained before the date of entry into force of this opinion may be used for licence application until 10 years after the date of entry into force of this Opinion (new paragraph 66.A.30(g));
- Theoretical and practical training completed before the date of entry into force of this opinion may be used for licence application until 3 years after the date of entry into force of this Opinion (new paragraph

66.A.45(i)).

resulting  
text

Refer to the resulting text at the end of the document, last comment (or last segment)

### B. Draft Opinions - II Draft Opinion Part 147

p. 18

comment

32

comment by: *Juan Ramon MATEOS CASADO*

It's too complex for basic schools to list the date passed for each module. It forces them to change the layout of their certificates.

response

*Not accepted*

EASA considers it is not a drastic change and the period for getting the approval from the EU will give time for using stocks and preparing the new layout.

resulting  
text

Refer to the resulting text at the end of the document, last comment (or last segment)

### B. Draft Opinions - II Draft Opinion Part 147 - Appendix III Example of Training Certificate

p. 18

comment

65

comment by: *ENAC*

In order to avoid confusion with courses that don't meet the requirement of appendix I to Part 147 (total duration and theoretical/practical ratio) we suggest to modify the statement in the box as follows "Specify Basic **approved** course, **as per appendix I to Part 147**".

response

*Noted*

comment

100

comment by: *Aircraft Engineers International (AEI)*

SPECIFY WHETHER TRAINING COVERED PART147 THEORITICAL ELEMENTS ONLY OR  
THEORETICAL AND PRACTICAL ELEMENTS  
START AND END DATE OF TRAINING PASSED

NOTE: Type training will not be recognised if obtained prior to completion of the required basic modules or proven prior basic knowledge.

-

\* \* \*

\*

	<p>Justification: This note needs to be added as result of AEI's comment on part <b>IV. Content of the draft opinion § 18</b>, where our reasoning was as follows:</p> <p>The reason for not granting credits is that, AEI &amp; EASA have serious doubts about the ability of persons without appropriate basic knowledge, gaining and retaining the necessary knowledge and understanding of the specific aircraft category they wish to be licensed on. After all one does not attend Secondary school before Primary school.</p>
response	<p><i>Noted</i></p> <p>Refer to comment n°99</p>

comment	<p>150 <span style="float: right;">comment by: CAA-NL</span></p> <p>Delete the change, to list all modules, date passed and start date of course.</p> <p>Add: "this certificate is valid until ....."</p> <p>Justification: With a validity date it is not necessary to add information for each module exam on the certificate. Also the starting date of the course is no longer required. However sometimes it can be useful to know starting dates because the starting date usual determines which regulations apply. The certificate will be much clearer and more transparent if only a validity date is required. Listing modules might lead to unnecessary checking that <u>all</u> modules are listed, which in case of listing by date can be confusing, with the module numbers out of order. Also the certificates will need two pages that might get separated or be difficult to identify if copied.</p> <p>Adding a validity date is very easy to do and for everybody easy to understand; it requires no calculation, only the conclusion whether the date has passed or not.</p>
response	<p><i>Not accepted</i></p> <p>Refer to comment n°145.</p> <p>Clarity about examination credits and credit report have been added in the new proposal.</p> <p>Refer to the explanatory note of the CRD, sub-paragraphs 6 to 10 where provisions have been added in order to be in line with the nature of this comment, by creating a new mechanism.</p> <p>Refer also to the resulting text.</p> <p>The new proposal, in addition to extending the period to 10 years, offers not to automatically consider those modules as expired but to evaluate if Part-66 Appendix I has changed during that period of time, and grant the appropriate credits for those modules that have not changed (no evolution of the content). Some modules may need to be repeated if they have become obsolete in relation to current Part-66 Appendix I requirements. This mechanism is now described in 66.B 405 via 66.A.25 (b) where examination credits should also apply to basic knowledge and be revised when necessary (evolution of the national qualification or of Part 66 Appendix 1).</p>

Similar provisions for the examination credit have been added.

Therefore it is not appropriate to state the validity on the training certificate.

resulting  
text

**Note:** For a better understanding why changes have been made, refer to the justifications described in the explanatory note at the beginning of this document.

**The changes here below show the changes between the current regulation and this CRD (amendment proposal of the current rules)**

## **I Draft Opinion PART-66**

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

A new paragraph b) is added to 66.A.10:

### **66.A.10 Application**

- (a) An application for an aircraft maintenance licence or amendment to such licence shall be made on EASA Form 19 and in a manner established by the competent authority and submitted thereto. An application for the amendment to an aircraft maintenance licence shall be made to the competent authority that issued the aircraft maintenance licence.
- (b) Each application shall be supported by documentation to demonstrate compliance with the applicable theoretical knowledge, practical training and experience requirements at the time of application.

Paragraph 66.A.25 is amended as follows:

### **66.A.25 Basic knowledge requirements**

- (a) An applicant for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence shall demonstrate, by examination, a level of knowledge in the appropriate subject modules in accordance with Appendix I to this Part.
1. The basic knowledge examinations shall be conducted by a training organisation appropriately approved under Part-147 or by the competent authority.
  2. The basic knowledge examinations shall be passed within the ten years prior to the application, except as provided by paragraph (c).
- Basic knowledge examinations that do not meet the criteria listed in paragraph (a)2 shall be assessed for examination credits in accordance with paragraph (b).
- (b) Full or partial credit against the basic knowledge requirements and associated examination shall be given for:
- any other technical qualification considered by the competent

authority to be equivalent to the knowledge standard of this Part. ~~Such credits shall be established in accordance with Section B, Subpart E of this Part.~~

- basic knowledge examinations that do not meet the criteria listed in paragraph (a)2.

The applicant must formally apply to the competent authority for examination credits.

Examination credits will expire ten years after they are granted to the applicant by the competent authority, except as provided by paragraph (c). After expiration, the applicant may apply for new examination credits.

All examination credits shall be granted in accordance with Section B, Subpart E of this Part.

- (c) Basic knowledge examinations and examination credits passed/granted before **(DATE OF ENTRY INTO FORCE)** may be used for licence application until **(10 YEARS AFTER THE DATE OF ENTRY INTO FORCE)**.

New paragraphs f) and g) are added to 66.A.30:

#### **66.A.30 Experience requirements**

.../...

- (f) The required experience shall have been started and completed within the ten years preceding the application for an aircraft maintenance licence or the addition of a category or subcategory to such an aircraft maintenance licence.

- (g) By derogation to paragraph (f), experience gained before **(DATE OF ENTRY INTO FORCE)** may be used for licence application until **(10 YEARS AFTER THE DATE OF ENTRY INTO FORCE)**.

Paragraph 66.A.45 is amended as follows:

#### **66.A.45 Type/task training and ratings**

...

- (d) Category B1 and B2 approved type training shall include theoretical and practical training and consist of the appropriate course in relation to the 66.A.20(a) privileges. Theoretical and practical training shall comply with Appendix III to this Part and shall have been started and completed within the three years preceding the application for a type rating endorsement.

...

- (i) By derogation to paragraph (d), theoretical and practical training completed before **(DATE OF ENTRY INTO FORCE)** may be used for licence application until **(3 YEARS AFTER THE DATE OF ENTRY INTO FORCE)**.

Paragraph 66.B.20 is amended as follows:

**66.B.20 Record-keeping**

.../...

~~(d) Records referred to in paragraph (b), 6. shall be kept at least five years.~~

~~(e)~~ (d) Records referred to in paragraph (b), 6., 7. and 8. shall be kept for an unlimited period.

Paragraph 66.B.200 is amended as follows:

**66.B.200 Examination by the competent authority**

.../...

(d) Type training examinations and type examinations must follow the standard specified in Appendix III ~~paragraph 3 and 4~~ to this Part.

.../...

Paragraph 66.B.405 is amended as follows:

**66.B.405 Examination credit report**

(a) ~~For each technical qualification concerned the report shall compare identify the~~ A comparison shall be made between the modules, sub-modules, subjects ~~matter~~ and knowledge levels contained in Appendix I to this Part and the syllabus of the technical qualification concerned, relevant to the particular category being ~~compared~~ sought. This comparison shall contain the justifications for each decision made and shall be documented, dated and recorded.

(b) The report shall include a statement of compliance against each ~~module and sub-module, substantiated by the comparison document, subject~~ stating where, in the technical qualification, the equivalent standard can be found. If there is no equivalent standard for the particular module or sub-module ~~subject~~, the report shall state such facts and no credit shall be given.

(c) The competent authority shall check on a regular basis whether the national qualification standard or Part 66 Appendix I have changed and amendments to the examination credit report are required. Such a comparison shall be documented dated and recorded. ~~Based upon paragraph (b) comparison, the report shall indicate for each technical qualification concerned the Appendix I subject matters subject to examination credits.~~

~~(d) Where the national qualification standard is changed, the report shall be amended updated as necessary.~~

A new paragraph 66.B.410 is added:

**66.B.410 Examination credit validity**

(a) The competent authority shall confirm to the applicant in writing any credits

granted.

- (b) Examinations credits will expire ten years after they are granted to the applicant, except as provided by 66.A.25(c).
- (c) After expiration of the examination credits per paragraph (b), the applicant may apply for new examination credits. If no changes have occurred to the syllabus of Part-66 Appendix I, the competent authority shall give a new ten year expiry date to these credits without further consideration. If Part-66 Appendix I has changed, the new credits will be amended as appropriate.

## Appendix II

### BASIC EXAMINATION STANDARD

A/ Paragraphs 1.11 and 1.12 are amended as follows:

...

- 1.11 ~~All Part-66 modules that make up a complete Part-66 aircraft maintenance licence category or subcategory must be passed within a 5 year time period of passing the first module except in the case specified in paragraph 1.12. A failed module may not be retaken for at least 90 days following the date of the failed module examination, except in the case of a Part-147 approved maintenance training organisation which conducts a course of re-training tailored to the failed subjects in the particular module when the failed module may be retaken after 30 days.~~
- 1.12 ~~The 5 year time period specified in paragraph 1.11 does not apply to those modules which are common to more than one Part-66 aircraft maintenance licence category or subcategory and which were previously passed as part of another such category or subcategory examination. The time periods required by 66.A.25 apply to each individual module examination, with the exception of those module examinations which were passed as part of another category licence, where the licence has already been issued.~~

B/ A new sub paragraph is added:

.../...

- 1.13 The maximum number of consecutive attempts for each module is three. Further sets of three attempts are allowed with a one year waiting period between sets.
- The applicant shall confirm in writing to the organisation appropriately approved under Part-147 or the competent authority to which they apply for an examination, the number and dates of attempts during the last year and the Part 147 organisation or the competent authority where these attempts took place. The organisation appropriately approved under Part-147 or the competent authority is responsible for checking the number of attempts within the applicable timeframes.

### Appendix III

#### Type training and Examination Standard

Paragraph 4 is amended as follows:

...

#### 4. Type examination standard

Where type training is not required, the examination must be oral, written or practical assessment based, or a combination thereof.

Oral examination questions must be open.

Written examination questions must be essay type or multiple-choice questions.

Practical assessment must determine a person's competence to perform a task.

Examination subjects must be on a sample of subjects drawn from paragraph 2 type training/examination syllabus, at the indicated level.

The examination must ensure that the following objectives are met:

- (a) Properly discuss with confidence the aircraft and its systems.
- (b) Ensure safe performance of maintenance, inspections and routine work according to the maintenance manual and other relevant instructions and tasks as appropriate for the type of aircraft, for example troubleshooting, repairs, adjustments, replacements, rigging and functional checks such as engine run, etc, if required.
- (c) Correctly use all technical literature and documentation for the aircraft.
- (d) Correctly use specialist/special tooling and test equipment, perform removal and replacement of components and modules unique to type, including any on-wing maintenance activity.

The following conditions apply to the examination:

- (e) The maximum number of consecutive attempts is three. Further sets of three attempts are allowed with a one year waiting period between sets. A waiting period of 30 days is required after the first failed attempt within one set, and a waiting period of 60 days is required after the second failed attempt.

The applicant shall confirm in writing to the organisation appropriately approved under Part-147 or the competent authority to which they apply for an examination, the number and dates of attempts during the last year and the Part-147 organisation or the competent authority where these attempts took place. The organisation appropriately approved under Part-147 or the competent authority is responsible for checking the number of attempts within the applicable timeframes.

- (f) The type examination must be passed and the required practical experience must be completed within the three years preceding the application for the rating endorsement on the aircraft maintenance licence.

- (g) By derogation to paragraph (f), type examination and practical experience passed/completed before **(DATE OF ENTRY INTO FORCE)** may be used for licence application until **(3 YEARS AFTER THE DATE OF ENTRY INTO FORCE)**.

- (h) Type examination shall be performed with at least one examiner present. The examiner(s) shall not have been involved in the applicant's training.

A written **and signed** report must be made by the examiner(s) to explain why the candidate has passed or failed.

## II Draft Opinion PART 147

Commission Regulation (EC) No 2042/2003 Annex IV is hereby amended as follows:

Paragraph 147.A.125 is amended as follows:

### **147.A.125 Records**

The organisation shall keep all student training, examination and assessment records for at least ~~five~~ **ten** years following completion of the particular student's course.

### **Appendix III**

#### **Example of Training Certificate**

The last text box of the Certificate of Recognition for basic training course or basic examination is amended as follows:

SPECIFY BASIC TRAINING COURSE or BASIC EXAMINATION (LISTING IN BOTH CASES EACH INDIVIDUAL MODULE EXAMINATION BY DATE PASSED) ~~AND DATE COMPLETED or PASSED~~

The last text box of the Certificate of Recognition for the type training course or type examination is amended as follows:

SPECIFY AIRCRAFT TYPE COURSE (START AND END DATE OF TRAINING PASSED) or AIRCRAFT TYPE EXAMINATION (DATE OF EXAMINATION PASSED) ~~AND DATE COMPLETED or PASSED~~

SPECIFY WHETHER TRAINING COVERED PART147 THEORETICAL ELEMENTS ONLY OR THEORETICAL AND PRACTICAL ELEMENTS

**III - Draft Decision PART 66**

Decision N°2003/19/RM Annex IV (AMC to Part 66) is hereby amended as follows:

A new GM 66.A.25(b) is added:

**GM 66.A.25(b) Basic knowledge requirements**

An application for new examination credits will lead to a reassessment of the examination credits (according to 66.B.405 and 66.B.410). Where changes to Part 66 Appendix I have occurred, there may be a need for further examinations of particular modules/sub-modules/subjects.

**Appendix A - Attachments**

 [RIA.pdf](#)

Attachment #1 to comment [#19](#)