



Opinion 05 / 2008: Time limitation for demonstration of knowledge and experience requirements

16 March 2010

EASA Rulemaking Directorate

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Time limits for knowledge and experience

Just for records

- ✦ Rulemaking task 66.004; composed of NAA and Industry experts
- ✦ NPA 2007-02 published on 20 March 2007
 - ➔ 196 comments received
- ✦ CRD 2007-02 published on 1 April 2008
 - ➔ 4 reactions
- ✦ Opinion 05/2008 was sent to Commission on 01 October 2008 and will be discussed with Member States on 29 April 2010.
 - ➔ http://www.easa.eu.int/ws_prod/g/rg_opinions_main.php



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Time limits for knowledge and experience

➤ **What state the current rules?**



Time limits for knowledge and experience: current situation

➤ Part-66 Appendix II basic knowledge :

★ **All modules that make up a complete Part-66 Aircraft Maintenance Licence (sub) category must be passed within a five year period of passing the first module**

➔ except in the case of common modules to more than one Part-66 Aircraft Maintenance Licence (AML) (sub) category already passed

★ **There are no limits regarding:**

➔ the number of attempts or waiting periods between attempts for each specific module.

➔ the amount of time available in order to apply for a licence once the basic knowledge has been demonstrated



Time limits for knowledge and experience: current situation

- **66.A.30 basic experience for AML:**
 - ★ **in the most restrictive case, the applicant for an aircraft maintenance licence shall have acquired five years of practical maintenance experience on operating aircraft**
 - ➔ if the applicant has no previous relevant technical training.
 - ★ **there is no limit related to the amount of time available in order to apply for a licence once the required experience has been acquired.**
 - ➔ For example, it is possible to apply for a licence 25 years after having completed the required experience (other than the minimum recent experience currently required).



Time limits for knowledge and experience

➤ Type Rating Training (66.A.45 - TRT)

★ **There is currently no time limit established for:**

- Completing the type training;
- Applying for a licence once type training has been completed.
 - For example, it is possible to get a TRT endorsed on the licence 25 years after having completed the training.



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Time limits for knowledge and experience

- **What are the objectives behind Opinion 05/2008?**



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Time limits for knowledge and experience

Main objective of Opinion 05/2008 is:

- ★ To avoid issuing an AML or endorsing a TR, when the training was received a very long time ago.
- ★ So to say, to give a limit for:
 - ➔ The validity of the knowledge, should it be basic knowledge (66.A.25) or TRT (66.A.45);
 - ➔ The validity of the experience (66.A30)
 - ➔ The number of attempts (examination);

But it is only before getting the AML or the TR endorsed on the AML... otherwise



Time limits for knowledge and experience

- ★ We can give a validity to the training before seeking the AML or the endorsement of the TR on the AML...but once the AML is issued or the TR is endorsed, it has to be considered valid for life:
 - No way to challenge the validity of a diploma.
 - no diploma in the education world have a validity such as baccalaureate, doctor, engineer...
 - There was no intent to introduce continuation training everywhere.
 - Otherwise the AML or the TRTs should have a validity...
 - Problem to be solved for the validity of the examination credits..

- ★ **But it does not prevent the privileges of the AML holder from being subject to:**
 - “recency”: 145.A.35(c) or 66.A.20(b) – 6 months of “recent experience” in the last two years...
 - Continuation training for certifying staff (145.A.30)



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Time limits for knowledge and experience

➤ **What states Opinion 05 / 2008?**



Time limits for knowledge and experience

Basic knowledge and experience for getting the AML

- ★ All basic knowledge (new 66.A.25) must be gained within the 10 years prior to the application for a licence.
 - ➔ **Certificate of recognition modified: date of passed module is recorded.**
 - ➔ **Except for common modules to more than one Part-66 Aircraft Maintenance Licence (AML) (sub) category already passed.**
- ★ Special mechanism to extend the 10 years validity of the modules and the examination credits provided that no evolution of the basic knowledge occurs during the last 10 years.
 - ➔ **For example, it will not encourage military staff to leave the Army because they fear that the basic knowledge modules they passed are not valid anymore. Or long term illness or people studying/working at the same time...**
 - ➔ **66.B.405 (credit report) was improved and new 66.B.410 (credit validity): a credit report is valid ten years; after it has to be renewed.**



Time limits for knowledge and experience

Basic knowledge and basic experience (before getting an AML)

All **basic experience** (new 66.A.30) must be gained within the 10 years prior to the application for a licence.

➔ **In addition to 66.A.30 (d): at least one year of experience must be recent. AMC 66.A.30 (f) further details (50% in the last 12 months).**

➤ **Examination** after a failed module

- ★ Shall not be retaken in the next 90days following the date of the failed module examination
 - ➔ May be reduced to 30 days in the case of a Part-147 approved maintenance which conducted the training and only when additional training is provided in the area where the candidate failed.
- ★ Maximum: 3 consecutive attempts
 - ➔ 1 year waiting period after 3rd attempt.



Time limits for knowledge and experience

Type Rating Training

- Theoretical (+ examination) + practical training (+ assessment) must have been started and finished within 3 years prior to application for licence endorsement.
 - ➔ **Also includes OJT when necessary**
 - ➔ **According to Opinion 05/2009, OJT becomes necessary only in the case of the first TR in the (sub)-category.**



Time limits for knowledge and experience

Type examination (when no training is required)

- ✧ Examination + practical experience must be completed within 3 years prior to application for licence endorsement.

- ✧ Maximum: 3 consecutive attempts with:
 - 30 days waiting period after 1st attempt.
 - 60 days waiting period after 2nd attempt.
 - 1 year waiting period after 3rd attempt.



Time limits for knowledge and experience

Grandfather provisions

- ★ Basic examinations passed, basic examination credits granted and basic experience gained prior to the entry into force of this amendment can be used for licence application until 10 years after the date of entry into force.
- ★ Type training completed prior to the entry into force of this amendment can be used for licence application until 3 years after the date of entry into force.
- ★ Type examination and practical experience completed prior to the entry into force of this amendment can be used for licence application until 3 years after the date of entry into force.



Time limits for knowledge and experience

Quick impact assessment

★ For the AML applicants:

- Time frame for the training: validity of the basic training and the basic experience before gaining an AML;
- Validity of the TR Training before endorsement on AML;
- Grandfathering provisions (smooth transition) for those who have already start the training before the entry into force.

★ For the Part 147 organisations:

- Certificate of training: start and end date of training passed
- Examination if the applicant fails
- Records keeping are extended to ten years (147.A.125)

★ For the NAAs:

- Check the start and the end date of the training passed;
- Credit (examination) report to be regularly updated and validity.
- Examination when preformed by the NAAs
- Records keeping for examination, credit and conversion reports shall be of unlimited period.



How to contact us

★ **General Emails for question:**

http://www.easa.europa.eu/home/contactus_en.html

★ **Queries related to rulemaking
(interpretation of the rules):**

rule@easa.europa.eu

➔ **Don't forget to copy your NAA** when the discussion is of common interest



Should you have any question on this presentation,
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END