



Opinion 05 / 2009

Task 66.009: Type and Group Ratings

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Current requirements

- **Currently in Part-66, for the purpose of endorsing aircraft type ratings on the aircraft maintenance licences, aircraft are classified as follows (see Appendix I to AMC to Part-66):**
 - Those aircraft for which licence holders must have an individual aircraft type rating endorsed on the licence. This includes all large aircraft (i.e. aeroplanes above 5700 Kg MTOM and multi-engine helicopters) and aircraft for which the Agency has determined that their complexity requires an aircraft type rating. For these aircraft, type training is required.
 - The remaining aircraft, for which license holders have the possibility of either have an individual aircraft type rating, or have an appropriate group rating or manufacturer group rating. In this case type training is not required. However, it is necessary to complete type examination and practical experience (at least 50 % of the tasks of Appendix II to AMC)



Feedback received by EASA

Feedback received by EASA showed the following concerns:

- Not clear what is an "aircraft type" in terms of maintenance: not clear when 2 different aircraft models/variants are similar enough to be considered in the same "type rating".
- No policy describing when an aircraft is considered complex in terms of maintenance (requiring individual type rating and training).
- Current aircraft groups are not related to the aircraft complexity.
- Current manufacturer group ratings for B2 licence holders are too restrictive if we consider that the technology is very similar between different aircraft manufacturers.
- Aircraft eligible for group or manufacturer group ratings currently require type examination on a representative number of aircraft. However, in many cases it is very difficult to find a provider for those examinations.



Task 66.009

- The working group 66.009 started working on June 2006 and the NPA 2007-07 was published on June 2007 (covering also tasks 66.006 and 66.011).
- The CRD was published on 05 October 2009.
- Opinion 05/2009 was published on 16 December 2009.
- Adoption by the Commission is expected before the end of 2010.



What is an "aircraft type" in terms of maintenance

- Appendix I to AMC to Part-66 contains the different type ratings to be endorsed on aircraft maintenance licences.
- Since EASA is responsible for defining these "type ratings", the criteria should be part of an EASA Internal Procedure. The process to define a "type rating" was included in the Regulatory Impact Assessment of the NPA and was the following:
 - ✦ All variants within the same aircraft TC are grouped in the same "type rating" (also aircraft from different TC if the same aircraft is manufactured by several TC holders)
 - ✦ Variants are then split in different "type ratings" depending on the engine type (one "type rating" per engine TC).
 - ✦ "Type ratings" are further split based on the following aspects:
 - ➔ When difference training is greater than 3 days or 10 % of original theoretical course.
 - ➔ Recommendations from TC holder and certification authority.
 - ➔ Differences in Maintenance Programmes.



What is a complex aircraft in terms of maintenance

- In order to avoid confusions with other Regulations and Implementing Rules, the term "complex aircraft" has been removed.
- Aircraft requiring an individual type rating and type training shall be classified by EASA in a single group (GROUP 1) in Appendix I to AMC to Part-66. This includes the following:
 - ✦ **All complex motor-powered aircraft (as defined in the Basic Regulation)**
 - ✦ **All non-complex motor-powered aircraft defined by the Agency (in accordance with the following criteria):**
 - ➔ Multiple engine helicopter, or
 - ➔ Maximum certified operating altitude exceeding FL290, or
 - ➔ Equipped with Fly by Wire systems, or
 - ➔ Maintenance procedures requiring specialized training (features not adequately covered by Part-66 Appendix I "Basic Knowledge Requirements").



Redefinition of aircraft groups in Appendix I to AMC to Part-66 (66.A.42)

- In order to simplify the current groups defined in Appendix I to AMC to Part-66, the following groups have been defined:
 - ✦ **GROUP 1:** All complex motor-powered aircraft and those non complex motor-powered aircraft requiring an individual type rating.
NOTE: This definition will likely be changed before adoption of the rule in order to clear state the criteria (see previous slide)
 - ✦ **GROUP 2:** Aircraft other than Group 1, in following sub-groups:
 - ➔ **Subgroup 2a:** single turbo-propeller aeroplanes.
 - ➔ **Sub-group 2b:** single turbine helicopters.
 - ➔ **Sub-group 2c:** single piston helicopters.
 - ✦ **GROUP 3:** Piston engine aeroplanes (other than Group 1)



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Redefinition of the scope of work of each licence category and conditions for the endorsement of such scope of work

- The proposed text is also aimed to achieve the following objectives:
 - ★ Redefine the scope of work of each licence category in order to align with the complexity of each group and with the similarity of technology, in some areas, between different manufacturers.
 - ★ Remove the need for Type Examination for some aircraft groups and licence categories, where it has been proven difficult to find appropriate examination providers (either organisations or competent authorities).

Changes are proposed in revised 66.A.45 and AMC/GM.
Refer to summary table in GM 66.A.45.



Limitations on group/sub-group ratings (66.A.45(i))

If no appropriate experience can be shown,
the following limitations will be included in
the B1.2 licence for group 3 rating:

- Pressurised aeroplanes,
- Wooden structure aeroplanes,
- Aeroplanes with metal tubing structure covered with fabric,
- Metal structure aeroplanes,
- Composite structure aeroplanes.



Limitations on group/sub-group ratings (66.A.45(i))

These limitations:

- Mean « exclusions » from the certification privileges.
- Affect the whole aircraft. Nothing can be released on the aircraft except pilot-owner maintenance tasks.
- Limitations can be removed by:
 - ✦ **Demonstration of appropriate experience** (AMC will be provided to explain that this means a variety of tasks related to the limitations supervised by authorised certifying staff, and properly documented), **or**
 - ✦ **after a satisfactory practical assessment performed by the competent authority.**



Limited validity of existing licences

- A new paragraph 9(h) has been introduced in Article 7 of EC2042/2003 in order to maintain the validity of those licences existing at the time of entry into force of this Regulation amendment.
- These licences will need to be converted to the new system at the first amendment or renewal of the licence after the entry into force of this Regulation amendment.
- This conversion will be performed in accordance with new article 66.B.125 *"Procedure for the renewal/amendment of licences with limited validity"*.
- Privileges will not be reduced.
- Those persons holding individual type ratings will maintain those ratings (no conversion applies to them).

See details in 66.B.125



Transition provisions for entry into force

- This Regulation amendment shall enter into force 90 days after its publication in the *Official Journal of the European Union*.

NOTE: Entry into force provisions may change before adoption in order to be consistent with the other opinions.