

NOTICE OF PROPOSED AMENDMENT (NPA) No 2007-02

DRAFT OPINION OF THE EUROPEAN AVIATION SAFETY AGENCY,

AMENDING

**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**

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

TABLE OF CONTENTS.

			Page
A		EXPLANATORY NOTE	3
	I	General	3
	II	Consultation	4
	III	Comment Response Document	4
	IV	Content of the draft Opinion	4
	V	Regulatory Impact Assessment	8
B		DRAFT OPINIONS	13
		Proposed changes to Regulation No (EC) 2042/2003	13
	I	Draft Opinion PART-66	13
	II	Draft Opinion PART-147	18

A. Explanatory Note

I. General

1. The purpose of this Notice of Proposed Amendment (NPA) is to envisage amending Commission Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks¹. The scope of this rulemaking activity is outlined in Terms of Reference 66.004 and is described in more detail below.
2. The Agency is directly involved in the rule-shaping process. It assists the Commission in its executive tasks by preparing draft regulations, and amendments thereof, for the implementation of the Basic Regulation², which are adopted as "Opinions" (Article 14.1). It also adopts acceptable means of compliance (AMC) and guidance material (GM) to be used in the certification process (Article 14.2).
3. When developing rules, the Agency is bound to following a structured process as required by article 43.1 of the Basic Regulation. Such process has been adopted by the Agency's Management Board and is referred to as "The Rulemaking Procedure"³.
4. This rulemaking activity is included in the Agency's rulemaking programme for 2007. It implements the rulemaking task 66.004 – 'Time limit for demonstrating compliance with knowledge and experience requirements'.
5. The text of this NPA has been developed by a dedicated EASA rulemaking group. It is submitted for consultation of all interested parties in accordance with Article 43 of the Basic Regulation and Articles 5(3) and 6 of the EASA rulemaking procedure.

¹ OJ L 315, 28.11.2003, p. 1; Regulation as amended by Commission Regulation (EC) No 707/2006 of 8 May 2006 (OJ L 122, 9.5.2006, p. 17).

² 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 1701/2003 (OJ L 243, 27.9.2003, p. 5)

³ Management Board decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material ("rulemaking procedure"), EASA MB/7/03, 27.6.2003.

II. Consultation

6. To achieve consultation, the Agency is publishing the draft opinion on its internet site. Comments should be provided within 3 months in accordance with Article 6(4) of the EASA rulemaking procedure. Comments on this proposal may be forwarded (*preferably by e-mail*), using the attached comment form, to:

By e-mail: NPA@easa.europa.eu

By correspondence: Process Support Unit
Rulemaking Directorate
EASA
Postfach 10 12 53
D-50452 Köln
Germany

Comments should be received by the Agency before **21 June 2007**. If received after this deadline they may not be considered. Comments may not be considered if the form provided for this purpose is not used.

III. Comment response document

7. All comments received in time will be responded to and incorporated in a comment response document (CRD). This may contain a list of all persons and/or organisations that have provided comments. The CRD will be widely available on the Agency's website.

IV. Content of the draft opinion

8. On 20 November 2003 the European Commission adopted Regulation (EC) No 2042/2003 on the continuing airworthiness of aircraft and aeronautical parts and appliances, and on the approval of organisations and personnel involved in these tasks. The provisions of its Annex III (Part-66) give a system of licensing for certifying staff that shall be qualified.
9. The issuance of any aircraft maintenance licence is based upon basic knowledge and experience requirements. Additional type ratings can be endorsed on the licence once the holder meets the required theoretical and practical elements.
10. European National Civil Aviation Authorities are of the opinion that the period during which compliance with knowledge and experience requirements has to be demonstrated, should be limited. There should be a time limit to comply with knowledge and experience requirements for both the basic licence and the type rating. It is felt that an applicant that spends too much time to obtain a licence has difficulties

with the knowledge/experience requirements. Such a limitation existed in the past in some national systems

11. Requirements for gaining a licence and type rating in accordance with Part-66 should be met in a proper time frame in order to maintain a high level of knowledge and safety.
12. The task to develop an opinion to change Part-66 and/or a decision to change its related AMC/GM was given to a drafting group to make an analysis as outlined below. The group was composed of both industry members and National Aviation Authorities.
13. When analysing the issue, the group found that:
 - The current situation defines some elements regarding time limits for basic modules and experience:
 - according to Appendix II of Part 66, all modules that make up a complete Part-66 aircraft maintenance licence category or subcategory 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 category or sub category already passed);
 - according to 66.A.30 (experience requirements), in the worst 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.
 - The time limit currently defined for basic knowledge requirements defines only a timeframe for completion of a set of modules applicable to a certain category, but it is not a time limit for completing an individual module. For the same reasons, a particular set of modules does not become invalid if the applicant did not apply for a licence.
 - The current “five-year” period is only valid for the basic training and did not prevent the applicant from gaining experience twenty five years later and then applying for a licence. 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.
 - There is currently no maximum time limit established for:
 - the validity of type training;
 - completing the type training;
 - the validity of the certificate of recognition before the trainee applies for a licence.
 - Consistency throughout the requirement is not ensured as it is not defined:
 - which type of documents have to be provided together with the application;
 - when the documentation supporting the application has to be sent to the National Aviation Authorities for issuing the Aircraft Maintenance Licence;

- if the knowledge and experience requirements for both the basic licence and the type rating have to be met before the application can be sent to the NAA.
- Furthermore, it is not specified within what timeframe a complete package of modules has to be provided with the application.
- It is possible to gain a module/type rating certificate after an unlimited number of attempts of the subject examination since there is no pre-determined time limit for completing the basic and type training.

14. Based on the above described analysis it is proposed that the following elements should be introduced into Part-66 and Part 147:

- Clear responsibility of the applicant to comply with all applicable knowledge and experience requirements for both the basic licence and the type rating before the application can be submitted to the NAA and to provide all applicable supporting documents with the application.
- A “seven year validity” period for a basic module in order to prevent the applicant from obtaining a basic licence based on, for example, a 25 year old set of passed modules for a specific Part-66 category and to give the applicant the possibility to comply with the experience requirements (which must also be complied with, within the seven year period prior to application) before the knowledge becomes invalid.

The rationale for setting up a maximum validity of “seven years” to cover both basic training and experience is justified in accordance with 66.A30 (a) 2. The required practical experience varies from two years for an applicant from an approved training school to five years for a self starter applicant. Approved training to Part 66 B1/B2 standard is of 3 to 4 years duration which would then allow a further 3 to 4 years for the applicant to obtain the required experience. 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.

Such a validity period gives more flexibility for demonstrating basic knowledge (“seven years” maximum instead of “five years”). Consequently, the previous “five-year” validity has been deleted.

Lastly, this “seven-year” validity:

- would ensure a good safety level;
- is consistent with Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003.
- Unlimited period of validity for Modules 1 to 4 of Part-66 Appendix I since these modules relate to generic subjects which are unlikely to change, while the other modules are aviation related and subject to constant evolution.
- Granting of examination credits only against technical qualifications gained within the preceding seven year period prior to the application for a licence. This takes into account the technical content of the qualification and ensures that it remains up-to-date with current technology. Furthermore, this would ensure that

technical qualification gained 25 years ago are not used to gain a credit, which would be valid for a further seven years.

- Three year validity period (before applying for the licence) to comply with the theoretical and practical elements of a type training to prevent the applicant from obtaining a type rating based on, for example, a 25 year old course certificate and to prevent a course being spread over (theoretical and practical training) an indefinite number of years.

This “three year” validity:

- would ensure a good safety level;
 - is consistent with Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003.
- Where a type training is not required, a three year validity period for a type examination (before applying for the licence) to prevent the applicant from obtaining a type rating based on, for example, a 25 year old examination. This “three year” validity:
 - would ensure a good safety level;
 - is consistent with the three year validity period to comply with the theoretical and practical elements of a type training .
 - A maximum of 3 attempts with a specified waiting period for re-training/re-study after the third attempt for basic modules and for type examination should be established to support the time limits as specified above. Maximum “three attempts” rule is consistent with some Member State national systems in place prior to the JAA and (EC) Regulation 2042/2003. It is commonly accepted that three consecutive failed attempts questions the ability of the trainee to pass exams and to succeed in this field.

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”):

- the applicant has 18 months to complete the required theoretical knowledge examination
- a pass in the theoretical knowledge examination remains valid for a period varying from 36 months to 7 years, depending on the licence seeking (CPL or ATPL) in order to gain the flying hour experience;
- an applicant should re-enter the complete examination if he has failed to pass any single examination paper within four attempts or has failed to pass all papers within six sittings.

16. The group decided that there is no necessity for a transitional period for those who are already in the training loop: the “seven year” period applies to all situations from the date of amendment to the rule being introduced. Those having older knowledge / qualifications intending to apply for a licence will still have the options to sit a few more exams. The safety level will be the same for every applicant.

17. In addition, the working group saw a requirement to set up a standard regarding type examinations conducted by the National Aviation Authority based on the existing criteria for Part 147 organisations in order to ensure consistency. Several criteria have been added:

- to ensure independence between the examiner and the trainer;
- to encourage the use of different examiners from those present in any previous examination to assess the applicant in case of several attempts.

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 licence 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.

V. Regulatory Impact Assessment

19. Purpose and Intended Effect

a. Issue which the NPA is intended to address

The purpose of this NPA is to assess the need for setting up criteria of a time limit for demonstrating compliance with knowledge and experience requirements when establishing a system of licensing for certifying staff that shall be qualified in accordance with the provisions of Annex III (Part 66) of Regulations (EC) No 2042/2003.

To maintain a high level of safety, there should be a time limit to comply with knowledge and experience requirements for both the basic licence and the type rating. Such limitations existed in the past in some national systems.

b. Scale of the issue (quantified if possible)

Procedures to which this proposal relates are relevant to all applicants for initial issue of an Aircraft Maintenance Licence (AML), change to a category or subcategory mentioned on the AML and type training endorsement on the AML.

c. Brief statement of the objectives of the NPA

The regulations establish a system of licensing for certifying staff that shall be qualified in accordance with the provisions of Annex III (Part 66) of Regulation (EC) No 2042/2003.

National Aviation Authorities are of the opinion that the period during which compliance with knowledge and experience requirements has to be demonstrated, should be limited.

20. Options

a) The options identified

Taking into account the proposals included within the present NPA, the Agency has considered several options:

Option 1 – Do nothing

The current requirement states that all Part-66 basic knowledge 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. This means that a person can complete all modules within a five year time period at which point this passed package of modules is valid indefinitely. Currently, there is no time limit defined for completing a type course; theory and practical training can be separated and completed within an unlimited time period.

This allows on the one hand for self studying and makes it easier to combine studies with work.

It also allows the applicant to obtain a type rating based on, for example, a 25 year old course certificate or a type training spread out over an indefinite number of years.

On the other hand, this system does not require applicants to show up-to-date knowledge before a license or type rating is issued.

Option 2 - Time limit on basic modules and type training to obtain a basic licence or type rating

Under this option, the period during which compliance with knowledge and experience requirements for the basic licence and type training has to be demonstrated is limited. If an applicant spends too much time obtaining a licence, he/she may have difficulties with the knowledge and/or experience requirements. This is also consistent with JAR FCL.

Therefore, requirements for gaining the theoretical and practical knowledge should be met within a limited time frame in order to maintain a high level of safety and knowledge. Such limitations existed in the past in some national systems.

This option is difficult for the self-starter in a working environment as it is more time consuming: he/she must gain experience and pass the basic knowledge examination at the same time. However, if an applicant can demonstrate all the knowledge within a limited time frame it can be considered that he/she has demonstrated the up-to-date knowledge necessary for a licence to be issued. This would have a positive impact on safety.

Option 3 - No time limit (at all)

Applicants have as much time as they want to pass all modules and gain necessary experience to obtain a licence and to apply for the rating.

The existing “five year” validity for basic knowledge is deleted.

b) The preferred option selected

The second option has been selected because it is considered an improvement on the existing regulation and will have a positive impact on safety. The period during which compliance with the knowledge and experience requirements for the basic licence and type training has to be met, should be limited. This will also prevent applications based upon qualifications obtained 25 years earlier.

Sectors concerned

Option 1 – Do nothing

No change to current situation

Option 2 - Time limit on basic modules and type training to obtain a basic licence or type rating

The Agency will not be affected

Member States will be affected.

Industry will be affected.

Applicants will be affected.

Option 3 - No time limit (at all)

The Agency will not be affected

Member States will not be affected.

Industry will be affected.

Applicants will be affected.

21. Impacts

Option 1 – Do nothing

Safety: The option of doing nothing implies that applicants may not have demonstrated the up-to-date knowledge necessary for a licence to be issued or the type training to be endorsed on the licence.

The current situation allows the applicant to obtain a basic licence based on an old basic knowledge and/or a type rating based on a 25 year old course certificate. Safety may be adversely affected.

Economic: None

Environmental: None

Social: None

Equity and fairness: None

Other aviation requirements outside EASA scope: None

Foreign comparable regulatory requirements: None

Option 2 - Time limit on basic modules and type training to obtain a basic licence or type rating

Safety: This option ensures that applicants will have to demonstrate the up-to-date knowledge and experience necessary for a licence or type rating to be issued.

This is an improvement to the existing situation where no limit was in place for either a complete set of modules for a specific Part-66 category, or a type course (theory and practical training) or to apply for a rating

Economic: There will be a negative impact for those individuals who need more than seven years to gain a basic licence or three years to gain a type rating. There is more flexibility about the validity the modules because the applicant has now seven years instead of five years in order to pass the basic knowledge.

Nevertheless the new “seven year” validity also embraces the experience, which might be stringent for those who self study at their pace without working in the maintenance field at the same time or without the possibility to do so in a near future. Fortunately, few applicants are affected in this manner.

Environmental: None

Social: None

Equity and fairness: There may be a positive impact with this option, due to the more clearly/precisely defined requirements and therefore the consistency of their application.

This will also have a positive impact on the concerned sectors (applicants, organisations, authorities etc.).

Other aviation requirements outside EASA scope: None

Foreign comparable regulatory requirements: None

Option 3 - No time limit (at all)

The existing “five year” validity for basic knowledge is deleted

Safety: This will lower the standard set by the existing regulation, as there will be no limit in place for either the completion of modules for a specific Part-66 category, or a type course (theory and practical training). The knowledge and the experience may not be up-to-date and may not be mastered under a continuous acquiring process. Safety may be adversely affected.

Economic: There may be a positive impact for those few organisations or individuals who require more than seven years to gain a basic licence or three years to gain a type rating because all time limitations would have been removed.

Environmental: None

Social: None

Equity and fairness: None

Other aviation requirements outside EASA scope: None

Foreign comparable regulatory requirements: None

22. Summary and Final Assessment:

After evaluation of the impacts of each option, the Agency proposes to amend Commission Regulation (EC) No 2042/2003 in line with option 2 since this would introduce an improvement to the existing situation where no limit is in place for either a complete set of modules for a specific Part-66 category, or a type course (theory and practical training). This option ensures that applicants will have to demonstrate up-to-date knowledge necessary for a licence or type rating to be issued and will prevent licence applications being granted based upon non recent/out of date basic knowledge training or non recent/out of date type training. There will be a further positive impact on safety, due to the more clearly defined requirements and therefore the consistency of their application. This will also improve fairness and equity.

B. DRAFT OPINIONS

I Draft Opinion PART-66

Article I

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.

Article II

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

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. 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 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 the 7 year period prior to the licence or additional category / sub-category application

Article III

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

Paragraph 66.A.45 (d) is amended as follows:

66.A.45 Type/task training and ratings

- (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 include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall 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 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 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 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.

Article IV

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

Paragraph 66.B.200 is amended as follows:

66.B.200 Examination by the competent authority

- (a) All examination questions shall 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 appoint examiners who shall 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 be retained in the records for reference.
- (f) All examination papers shall 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 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 be banned from taking any further examination within 12 months of the date of the examination in which they were found cheating.

Article V

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

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 period of 7 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.

B/ A new sub paragraph is added:

....

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.

Article VI

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

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.
- (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.
- (f) The passed type examination is valid for three years after which it has to be redone.
- (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.

A written report must be made by the examiner to explain why the candidate has passed or failed.

Article VII

Commission Regulation (EC) No 2042/2003 Annex III is hereby amended as follows:

Appendix V**Application Form and Example of Licence Format**

EASA FORM 19 is amended by adding paragraph 4 in the last part, as follows:

...

I wish to apply for initial / amendment / renewal of Part-66 AML, as indicated and confirm that the information contained in this form was correct at the time of application.

I herewith confirm that:

1. I am not holding any Part-66 AML issued in another Member State,
2. I have not applied for any Part-66 AML in another Member State and
3. I have never had a Part-66 AML issued in another Member State which was revoked or suspended in any other Member State.
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

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.

....

...

II Draft Opinion PART 147*Article VIII*

Commission Regulation (EC) No 2042/2003 Annex IV is hereby amended as follows:

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 (LISTING EACH INDIVIDUAL MODULE
BY DATE PASSED) or BASIC EXAMINATION (EACH INDIVIDUAL MODULE)
AND DATE COMPLETED or PASSED

The last text box of the Certificate of Recognition for the type training course is amended as follows:

SPECIFY AIRCRAFT TYPE COURSE or AIRCRAFT TYPE EXAMINATION AND
DATE COMPLETED or PASSED

SPECIFY WHETHER TRAINING COVERED PART147 THEORITICAL ELEMENTS
ONLY OR THEORETICAL AND PRACTICAL ELEMENTS

START AND END DATE OF TRAINING PASSED

*