

Type ratings of a Part-66 licence

What is a difference between examination and assessment? Why are there two different examination standards, respectively in Part-66 Appendix III, points 4 and 5?

Answer

Examination is a written form of demonstration of a certain level of theoretical knowledge by the student based on achievement of the learning objectives, usually performed on completion of a theoretical training course or a portion of a course. The student shall demonstrate, to the levels identified in the table in Appendix III, the detailed theoretical knowledge of the aircraft's applicable systems, structure, operations, maintenance, repair, and troubleshooting according to approved maintenance data, as well as the use of manuals and approved procedures, including the knowledge of relevant inspections and limitations. The standard, format, pass mark, etc. are defined in Appendix III, 4.1. The examination shall be performed by the appropriately trained and approved examiner.

Assessment is a practical form of measuring the competence of the student by evaluating three major factors associated to the learning objectives: knowledge, skills and attitude, usually performed on completion of a practical training course. The assessment should focus on the competencies relevant to the aircraft type and its maintenance. The principles on how to perform the competence assessments are given in the AMCs to Part-66, Appendix III. The assessment shall be performed by appropriately trained and approved assessors.

Regarding Part-66 Appendix III, point 5., "Type Examination Standard" does not apply to the examination performed as part of type training. This point only applies to those cases where type examination is performed as a substitute for type training, which means it is intended for the examinations conducted by (or on behalf of) the national competent authority on those aircraft that do not require a type training (typically Group 2, Group 3 and Group 4 aircraft according to Appendix I to the AMCs to Part-66). So, it is true that the examiners authorised by the national competent authority shall not have been involved in the applicant's training. In all other cases AMC to Part-66 Appendix III applies, which means that the roles of the assessor and the instructor may be combined for the practical elements, depending on the size of the organisation.

Regarding the roles of examiners and assessors, these are different functions (which does not

prevent that one person can't be authorised both as examiner and assessor). Normally, these functions should not be confused. The expression "The examination shall be oral, written or practical assessment based, or a combination thereof, ..." applies only for Section 5, i.e. "Type Examination Standard".

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I have attended a type training, may I immediately ask my authority to endorse it on my licence?**Answer**

Yes, if the following conditions are met for the theoretical + practical parts of type training:

- the course has been attended and the exams passed in a Part-147 approved training organisation,
- or in another organisation, provided the course has been directly approved by the authority who issued the licence as per 66.B.130,
- and for B1, B2 and L5 licences, in case where the aircraft type is the first in a licence category or subcategory, an OJT training has been performed (derogation for Group 2 and 3 aircraft see 66.A.45(d)).

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I hold a licence with a type rating and I wish to add the rating of a similar aircraft of the same manufacturer. For example: I have a type rating on Airbus A320 Series, and I wish to add the rating on A330 Series. Do I need a complete course?**Answer**

If aircraft types of the same manufacturer have different type ratings as stated in Appendix I to AMC to Part-66, there is a gap of knowledge preventing the endorsement of the second

aircraft type. E.g. the Airbus A330 (GE CF6) is a different rating to the Airbus A318/A319/A320/A321 (CFM56).

If the Airbus A318/A319/A320/A321 (CFM56) is previously endorsed or the criteria for endorsement are met (based on conversion or type training) the Airbus A330 (GE CF6) can be endorsed (within the time limits) following either

- a complete theoretical + practical Airbus A330 (GE CF6) course, or
- a differences training course, theoretical and practical for Airbus A330 (GE CF6) compared to Airbus A318 (CFM56) (and/or A319/A320/A321) as described in Appendix III point 1(c).

Those training courses may either be provided by a Part-147 training organisation or by the competent authority.

Remark: A Part-147 organisation difference training is not required for variants within the same aircraft type rating, for example: from A320 to A321. Nevertheless, some training to cover the differences may be necessary. This may be provided by an approved maintenance organisation, before issuing the certifying staff authorisation, (see AMC to Paragraph 1(c) of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. On-the-Job Training').

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I just got an empty Part-66 licence. I plan now to get type ratings. Are 2 weeks practical training sufficient?

Answer

As per the new Regulation (EC) No. 1149/2011, the practical element of training is no longer a question of time. The duration of the practical training should be adequate in order to complete the contents required by paragraph 3.2 of Appendix III to Part-66.

For aeroplanes with a MTOM equal or above 30.000 kg the duration for the practical element of a type rating training course should not be less than two weeks.

In addition, for B1 and B2 licences, where the aircraft is the first in a licence category or subcategory, an on the job(OJT) training shall be performed.

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The Appendix III of Part-66 states that a type training course shall be started and finished within 3 years before the application for a type rating, is this still valid if I started the course before 1 August 2012?

Answer

Type training courses started and finished before 01 Aug 2012 can be used for rating endorsement application until 31 July 2015.

Any theoretical type training course finished after 01 Aug 2012 can be used for rating endorsement application until 3 years after they were started (even in the case where they were started before 01 Aug 2012).

Any practical type training course finished after 01 Aug 2012 can be used for rating endorsement application until 3 years after they were started (even in the case where they were started before 01 Aug 2012).

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Is it mandatory to go to a Part-147 approved training organisation to get type training? Can we do this training in a Part-145 approved organisation or at the aircraft manufacturer?

Answer

Only approved Part-147 organisations are entitled to conduct type training courses in accordance with Article 6 of the Commission Regulation (EU) No 1321/2014. However, according to Appendix III to Part-66, other than Part-147 organisation (including Part-145 maintenance organisations and manufacturers) can be approved by their competent authorities to provide theoretical element (theoretical training and examination) and/or practical element (practical training and assessment) of aircraft type training. This so called “direct” approval may be given by the competent authority in accordance with 66.B.130 provided:

- This is a one-time approval on a case-by-case basis for a single course or a predefined group of courses i.e. Part-145 approved maintenance organisation cannot receive a permanent approval for aircraft type training.

- The course and the assessment comply with the same standard valid for approved Part-147 organisations; this standard is described in paragraph 1 to 4 of Appendix III to Part-66.
- No Part-147 Certificate of Recognition can be issued for the purpose of the mutual recognition between Member States. However, an appropriate training certificates can be issued after successful completion of both elements.

Directly approved aircraft type training course is only valid for Part-66 AML type rating endorsement by that Member State, which means it cannot be used for aircraft type endorsement by other Member States (no mutual recognition of the certificate), unless this other competent authority has approved the course as well.

In the case of type training for airships in Group 1, the courses shall be directly approved by the competent authority in all cases. The competent authority shall have a procedure to ensure that the syllabus of the airship-type training covers all the elements contained in the maintenance data from the Design Approval Holder (DAH) (66.B.130(b)).

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I have passed the aircraft type rating training (TRT) in an approved EASA Part-147 organisation, although I have not completed the basic knowledge training. Is this TRT valid for life? Would it be possible to endorse it on my Part-66 licence as soon as I get one?

Answer

Aircraft type rating training must have been started and be completed within the 3 years preceding the application for a type rating endorsement (Part-66, Appendix III, paragraph 1).

It does not make sense to attend in the first instance a TRT course with the intent of getting this TRT later endorsed on the maintenance licence for two main reasons:

- At the time the TRT is gained, the holder has no licence and it may take more than 3 years before the applicant is compliant with the basic knowledge (66.A.25), as well as the experience requirements (66.A.30). Therefore the applicant runs the risk to get its TRT certificate expired at the time he applies for the licence and the TRT endorsement; and
- From an intellectual point of view, it is not logical to demonstrate maintenance competence on a specific aircraft type without having acquired the basic knowledge, skills and attitude related to the maintenance and the technologies used in aviation, in general.

Legally speaking the situation is not forbidden. However be sure that you get your licence within the three-year timeframe from the date you **started** the TRT course [see Part-66 Appendix III 1.(a)(iv) and (b)(v)].

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