



European Union Aviation Safety Agency  
**Comment-Response Document (CRD) 2020-12**

---

RELATED NPA: 2020-12 — RELATED OPINION No 07/2022 — RELATED DECISION 2023/019/R

RMT.0255 (MDM.059)  
'REVIEW OF PART-66'

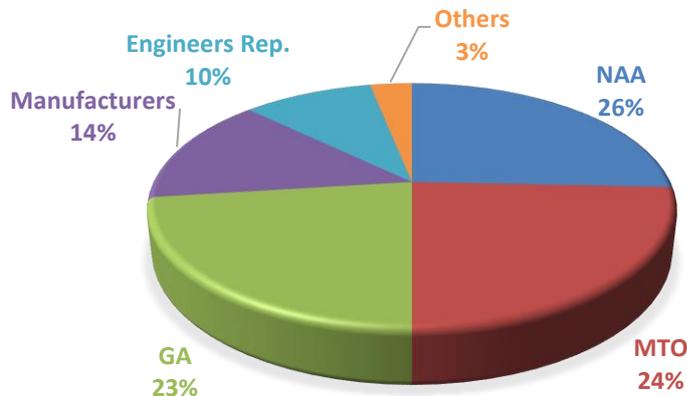
### Table of contents

1. Summary of the outcome of the consultation	2
2. Individual comments and responses	5
3. Appendix — Attachments	243



## 1. Summary of the outcome of the consultation

NPA 2020-12 received in total 518 comments:



From	Comments	Organisations
<b>National competent authorities (NCAs)</b>	133	AESA, LBA, ENAC CAA-NL, DGAC, UK CAA, CAA-NO, SWE, Austrocontrol, CAA-FIN, IAA, ICETRA, CAA-LUX
<b>Maintenance training organisations (MTOs)</b>	126	KLM, British Airways, EAMTC, 147 NL-DE, Eurowing, AVIATEC, Savo, LRTT, Tampereen vocational college TREDU, SAS, Adria, AEROK.
<b>General Aviation (GA) community</b>	119	KNVVL Royal Netherlands Aviation Organisation, EAS, SAMA-ECOGAS, Luftsport Verband Bayern e.V., iAOPA, osk Hyvä Tapa Harrastaa, ESMA, EGU
<b>Aircraft manufacturers</b>	74	Airbus, Leonardo, Volocopter, Lilium, Flying Whales, Zeppelin
<b>Representatives of engineers and individuals</b>	50	AEI, EHA, Norsk Helikopter Ansattes Forbund, SFF, Svensk Flygteknikerförening.
<b>Other organisations/associations</b>	16	IATA, FNAM, IACO
<b>Total</b>	518	

In general, the vast majority of the comments support the draft amendments of the NPA and provide constructive proposals for the improvement of the individual amendments proposed by EASA. Considering that some of the comments provided by certain stakeholders pursued objectives that were contradictory with those proposed by other stakeholders, not all the comments received led to changes of the proposed text. However, EASA has taken all comments thoroughly into account and accepted all those considered to be contributing to the improvement of the proposed amendments.

A large number of comments, provided mainly by GA and by individuals, challenge the whole concept of Part-66. Suggestions to have a separate Part-66L dedicated exclusively to the L licences or to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders (TMG) and ELA1

aeroplanes) were received. These comments have been noted; however, EASA considers premature to rediscuss the concept of the 'light' L licences, since they have been introduced only recently. The acquisition of more data and experience that will come from their practical implementation on field, will allow, at a later stage, a deeper and more appropriate evaluation by EASA.

The proposals for recognition of an OJT already approved for an AMO (upgrade AMC 66.B.115 (c) to the implementing rule level) or to move the OJT mechanism/principles to Part-145 under the Personnel Requirements (145.A.35) or under the organisation's qualification scheme, received strong opposition from most of the commenters. In the first case, many authorities want to keep the possibility to not recognise OJT already approved by another authority due to the different standards expected from the AMO for this process, especially for those carried out in non-EU countries. In the second case, the OJT is considered as a training requirement that shall remain under the remit of Part-66. No other practicable option came from the stakeholders that were invited to propose and justify other alternative solutions.

In light of the above, EASA decided to keep the OJT in Part-66 but improving the requirement both in the rule and in the future AMC & GM.

The proposal to introduce a practical skills assessment, applicable only for self-trained students without a vocational training or without being considered 'skilled workers', has been welcomed by major part of the commenters, although many consider it an additional regulatory burden for applicants for a Part-66 licence and a not yet mature concept for implementation in the rule.

However, a number of questions have been raised and are still to be discussed:

- How should the practical skills assessment be carried out in practice?
- What is the assessment standard that could be considered acceptable?
- What is the perimeter and the final goal of the competencies to be assessed?

The International Civil Aviation Organization (ICAO) is currently considering these questions, and it is reasonable to think that some essential guidelines will come from the concretisation of the ICAO CBTA<sup>1</sup> concept where the practical skills are assessed in the frame of a more general evaluation of the student's competencies<sup>2</sup>.

ICAO CBTA applies generally across all aviation licence disciplines (maintenance personnel, traffic controllers and pilots), with special emphasis on the development of adapted competency models, methods to assess competence and definition of competency standards.

CBTA-related amendments to ICAO standards would be based on these CBTA concepts and principles to ensure common understanding of the impact of implementation. CBTA should be introduced into Annex 1 as the alternative means of compliance with the prescriptive knowledge acquisition requirements, and the development of CBTA guidance will ensure identification of consistent CBTA procedures and practices regardless of the discipline.

<sup>1</sup> **CBTA: Competency-based training and assessment.** Training and assessment that are characterized by a performance orientation, emphasis on standards of performance and their measurement, and the development of training to the specified performance standards.

<sup>2</sup> **Competency.** A dimension of human performance that is used to reliably predict successful performance on the job. A competency is manifested and observed through behaviors that mobilize the relevant **knowledge, skills, and attitudes** to carry out activities or tasks under specified conditions (ICAO definitions).

At the moment, it is not yet defined how the CBTA methods will be introduced in the rule and how CBTA output can be credited for the licence, hence the risk of overlap and conflict with the practical skills assessment proposal of NPA 2020-12 is too high.

In view of that, EASA has decided not to include a practical skills assessment proposal in this Opinion.

The proposed solution for maintenance licences regarding aircraft with electric propulsion that are not covered by Part-66 was unanimously opposed because it was considered as not efficiently fulfilling the scope. In consideration of the fact that this is an issue related to a more general regulatory gap regarding non-conventional aircraft (i.e. aircraft other than aeroplanes, rotorcraft, sailplanes, balloons or airships; or aeroplanes or rotorcraft with a power plant other than a piston engine or turbine), EASA has decided to address it within the wider scope of RMT.0731 'New air mobility', and NPA 2021-15<sup>3</sup> now proposes other suitable solutions that supersede the proposal of NPA 2020-12 in regard to potential new licence categories for aircraft with electric propulsion.

Some concerns have been raised regarding the risk to deviate from the required standard if the content of Appendix I is moved to AMC.

Several comments also asked that AMC and GM should provide more guidance for the proposed changes and EASA has kept this recommendation for the Decision.

---

<sup>3</sup> <https://www.easa.europa.eu/document-library/notices-of-proposed-amendment/npa-2021-15>



## 2. Individual comments and responses

In responding to the comments, the following terminology is usually applied to attest EASA's position:

- (a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.
- (b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.
- (d) **Not accepted** — EASA does not agree with the comment or proposed change.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
1	Aircraft Technical Book Company	<p>These are huge changes, requiring a near total rewrite of module, every syllabus, and every examination database. What are you thinking would be a timeline for this to take affect? It would be nice if it can be slowed down to one module at a time (perhaps one per year). Otherwise this may be beyond the capability of many P147s and their supporting agencies. Some further thought; As I said before, the extent of these changes are enormous, and probably way beyond the ability of most MTOs to quickly reach both academically and for lab work. While most of the new topics make sense from an evolving technology point of view, they must be implemented on a long enough time scale so that MTOs and those who support them, can fulfil the requirements properly and at the level of quality which they deserve. In addition for the sake of consistency, rather than declare a single completion date in months or years for the full compliance, I suggest specified and staggered individual module completion deadlines for each, based on the complexity of changes in each module. For example, by June 2021, everybody must update M1, then by December the M2 update is required, and so forth. Without this staggered schedule, every MTO will be different based on their own internal expertise on a particular subject, and thus student qualifications will be wildly different in the interim between various MTOs. Beyond that, a couple of quick observations: a) Why are we still requiring wood and fabric for B1.1? b) On electric propulsion. Yes, in the future this and perhaps hydrogen are important. But for today, we have only a small handful of experimental electric prototypes based on 2-3 company's proprietary technology. Until designs are settled and practical training devices exist, especially for B1.1, how is this possible to teach?</p>	<p>Accepted.</p> <p>An adequate transition period is established and specified in the Articles of the Cover Regulation, in order to allow for the implementation of the changes by the competent authorities and the training organisation.</p> <p>Some grandfathering provisions are provided for training and exams passed according to the old requirement.</p>
2	SAS IntAIRactions	<p>on page 147 / Chapter OJT 6.3.2 it is written: Mentor : ...have delivered train-the-trainer courses...Assessor : ...have delivered train-the-trainer courses...suggestion to write instead :Mentor : ...have been delivered train-the-trainer courses...Assessor : ...have been delivered train-the-trainer courses...</p>	<p>Not Accepted.</p> <p>Requirement reformulated as follows:</p> <p>Mentors: have experience in training other people (such as being apprenticeship trainers, Part-147 trainers, having received train-the-trainer courses or having any other comparable national qualification, or having a training to do so that is acceptable to the competent authority).</p> <p>Assessors: have experience and/or have received training in assessing others (such as being apprenticeship trainers, Part-147 examiners, having received train-the-trainer courses, or having any other comparable national qualification, or having a training to do so that is acceptable to the competent authority).</p>
3	LRTT LTD	<p>With all the various licence classifications, is there still a need for CAT A1,A3, B1.1 &amp; B1.3 to study 6.3.2 Wooden structures and 6.3.3 Fabric Coverings. Surely these</p>	<p>Not Accepted.</p> <p>6.3.2 on wooden structures remains at very low level 1.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		topics would sit better in other licence categories that actually have wooden structures and fabric coverings and remove it from the CAT A1,A3, B1.1 & B1.3 syllabus all together.	
5	Zeppelin Luftschifftechnik	For helicopters and airplanes there is a CAT A. This qualification does not exist for airships. But it is urgently needed because otherwise you need an expensive and highly qualified B2 or L5 for simple tasks (e.g. changing switches).	Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) 'Airships' envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025.
6	private	.	Noted.
7	private	Dears ,i would like to highlight my concerns of the current situation and would like to see some improvements in a new part 66 rules its to easy to obtain a part 66 licence from abroad without having proper basic level of a degree ( aeronautics , principles of gasturbine engines , electric and technical english etc ) i have been encoutered several times with part66 B1 holders ( cs ) which do not have the proper background ( degree) what it was in 1999-2000 , people from no aviation background just " buy " their AML and consider themselves as an CS which is no good for aviation and safety , people can buy their licence from countries such as " greece , Turkey , Bulgaria , Romania ,this has been a lucrative sector for making easy money .companies with 147 approval sell the courses without any background check and just think about to make money . Also some airline and MRO support this kind off companies because they supply cheap labor . I would like to see that aviation and especialy the Part145 side is back to the level of late 90's when aviation was for real aviators whit passion for their work and all graduated engineers eager to become a Part 66B1 CS . THIS FOR SAFETY IN AVIATION i would be very pleased if we can start this discussion with EASA and professional Part 66 holders to make a guideline . rgrds	Noted.
8	Royal Netherlands Aviation Organisation	Dear EASA Team,We value the efforts to improve rules and regulations. However we like to ask EASA to seek more close contact when drafting rules, regulations and changes with specific sectors, such as glider pilots, AML-holders, clubs and their representations (either national aeroclubs, or European Representatives like European Gliding Union or European Airports). For instance, the rule making team working on NPA 2020-12, has no relation to the glider flying community.We see all too often that EU regulations are not fit for purpose wenn introduced (incorrect, incomplete, not tested in the field, too slow) and have to be reworked. We should all (EASA, EU, Sector) look for rules that are "first time right", proportional, serving a purpose. The way the process works now is anything but "LEAN". Due to rework there is a lot of added cost or "MUDA" without any added value. We are all wasting a lot of scarce resources. Examples: the introduction of Part CAO, PART ML, PART FCL, PART 66 L, PART Medical and so on. Example:	Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft'; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>change from MG CAMO to CAO costs us already € 20000, - and we still have the same rights and obligations (nothing lighter or more proportional, rather the contrary). Changes introduced by ML requires redoing Aircraft Maintenance Programs (another 500 days of labor for 500 gliders down the drain), Part 66 L examinations, removal of limitations is almost impossible. This NPA: similar story. It is based on an EASA MB decision of 2015! and changes are based on an enquiry conducted in 2016. REMARK: in 2015 and 2016 Part 66 L1,L2 was not even in force! There were no user experiences in 2015 /2016 with Part 66 L1,L2. Yet the rulemaking team suggest that changes are necessary for amongst others L1,L2 based on the 2016 enquiry? What the rule maing team should do is invite representatieves from the glider scene (in teh spring of 2021) and investigate was has to be regulated , what not and implement that within 6 to 12 months max. The current EASA proces is not Kaizen (small steps improvement) and not Agile (swift and flexible adoption to meet changing requirements). Think about it: The source of this NPA is 2015, the NPA is published in 2020, it is supposed to become law in 2023..... That is 8 years to change something...? Back to Part 66 L1,L2: As an example, we have been discussing with the CA to conduct Part 66 L1,2 exams for over three years (!). Much time and money was spent (wasted). Per today we have not yet hold any examination (still waiting for a written permission). Consequence: we have not been able to train new AM-holders and have not been able to add new staff to the existing AML holder population. We lost 5 years due to poor project management of the EU, EASA, CA. The rule making system is just not effective, slow, not first time right. Since the introduction of EASA, regulations are constantly changing. The regulation framework is unstable. In the sector we are made to adhere to an unstable law and regulation system. It is driving us crazy. Why? We had national regulations in place that were stable and were developed in a 70 year time frame. With respect to Part ML, CAO, PART 66 L1,L2 we have additional suggestions for improvement based on the experiences with made since the implementations in 2018 and 2020. What missis by the way is a helpdesk were one can ask questions about rules and regulations. EASA does not provide help and point to CA. The CA again does not feel it is her task to provide help and often is not well prepared herself (take part ML, CAO, and 66). So problems arising around implementation of new regulations are just shoved down the throats of owners, clubs, AML holders and small 1 man CAMO's, MF's, 145's. Thank you for your time to review our comments. We hope that are remarks are taken seriously, as is our invitation to work more closely together in the rule making process. Only regulate what is necessary to keep gliding safe and regulate in such away that rules can be implemented adhered to and are</p>	<p>recently created L licences. However, some other particular topics deserve some dedicated clarifications: OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>undrestandable and sensible. Do not regulate what does not need to be regulated. Do not regulate things because it looks nice on paper. Paper checklists are not helping safety. They only help to put the blame on somebody in case something goes wrong. Funny enough the blame always lands with the weakest in the chain: the owner or the AML -holder, the pilot. We truly hope our well-meant input is not just dismissed as not related to the few items described in the NPA. Egbert Veldhuizen Royal Dutch Aeroclub, KNVVL, Gliding, chairman committee continuing airworthiness www.knvvl.nl Some facts on the Dutch gliding community. I (Egbert Veldhuizen) am a member of the Dutch Aeroclub (Koninklijk Nederlandse Vereniging voor de luchtvaart). I am chairman of the committee Continuing Airworthiness for Gliding and Coordinator Continuing Airworthiness in our CAMO/CAO, and holder of a Part 66 L2. We represent some 3500 glider and motor glider pilots, active in 30 clubs. We operate about 550 gliders, both club and privately owned aircraft. All our activities are recreational and take place in weekends or holidays. In total we have some 150 licensed glider technicians according to Part 66 L2 (all converted from national licenses). The technicians are all members of their respective clubs. In the CAMO/CAO we have about 70 AR staff, who provide the ARC's and Airworthiness Reviews for aircraft in the associated clubs. The Airworthiness Review Staff are active members of the clubs. Most clubs only operate gliders (sustainer, self-launch, TMG). One club is TMG only. Only a few clubs operate a tow plane (ELA-1). (Annual) inspections, ARC-renewal, small to large repairs are performed by AML staff in the clubs. There is one commercial MF/MG company servicing some private owners and performing complex tasks like fuselage repair, or jobs that need to be completed quickly. Pilots are trained in a joint DTO, some local clubs have their own DTO. As KNVVL we are a member of European Airports and European Gliding Union. We shortly hope to obtain permission by the Competent Authority to organize Part 66 L 1, L2 theoretical exams (after 3 years of discussion with the CA).</p>	
9	Royal Netherlands Aviation Organisation	<p>As far as gliding is concerned the executive summary is not based on facts. Ref.: 1.1: The changes in Part 66 L1 and L2 are not based on analysis and facts. The RMT 0255 /EASA has not defined measurable standards. The rmt has not reviewed the competences needed to safely maintain, inspect, modify and release to service (powered) gliders. The RMT has not been in contact with the sector (European Gliding Union, European Airports or National Aeroclubs like KNVVL). The RMT has not learned from the past (gliding and glider maintenance is already performed over 60 years). Still the RMT feels it can propose rules that will make glider maintenance in clubs more difficult or nearly impossible. The RMT has no case! Less than ONE % of accidents with gliders is due to poor maintenance. Look</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>at EASA accident statistics: 95 % of accidents are pilot/ operations related. Some 5% of incidents are due to poor designs (hence AD's). Yet EASA/RMT impose unrealistic requirements on Part 66 L1 L2 AML-holders. Very complex and difficult Multiple Choice exams (EASA did not publish a question database nor study material. This is unacceptable!). Further the currency requirement for an individual Part 66 L1.L2 is unrealistic. EASA request proof of 100 working days in two years! Fine for a professional perhaps working in a 145 setting. But unrealistic for a volunteer in a club. Compare this with the requirements for SPL-holders. An glider instructor for instance needs only 30 launches or 30 hours in three years (roughly 6 days). There is clearly no holistic view and approach to gliding safety (medical, FCL, airspace, design, airworthiness, etc.). The result is a unbalanced system of rules and regulations (Part 66 requirements are by far too heavy). Then the update of the basic knowledge syllabus. That indeed is needed, although we have not even been able to examine anyone according to the current version for ML. Unfortunately the RMT means with "update" add more and unnecessary requirements derived from large aviation. Requirements that do not fit to the nature of glider maintenance. A good idea may be for EASA to detach glider maintenance from the PART 66 system completely and make a separate EU requirement for gliders only or again deregulate this completely for (powered) gliders up to ELA-2. Further EASA- the RMT should seek contact with the sector. Rules and regulations should work for us (not against us). Only regulate what is necessary. Decide fact based for our specific sector. Do not enforce rules and regulations simply copied from commercial maintenance in 145, MF, CAO with slight modifications.</p>	<p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p> <p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes.</p> <p>It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t.</p> <p>Some members of the GA community ask for a diverse redefinition of the content</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>of these modules and new assignment of the applicability for the L1 and L2 licences.</p> <p>Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
10	AvcatABC	<p>NPA 2020-12 2. In summary — why and what... As regards 'Objective b': Competency Definition "Competence can be defined as a measurable skill or standard of performance, knowledge and understanding which takes into account attitudes and behaviours." Question: How can 'Approved' member state Aircraft Maintenance 'Organisational approaches' ever satisfy ICAO Annex 1 requirement to employ state qualified Aircraft Maintenance Engineer (AME)s – whilst both NAA Regulators and Approved Organisational management allow issue of Authorisation Certificates (on-Type), simply being 'handed-out' following induction of 'Trade' contractors &amp;/or 'ATA Chapter' specific employees, across many parts of mainland Europe? Proposal Deeper collaboration between industry and (EU) Member State - National Aviation Authorities to realise initial levels of 'Category A' Basic knowledge guidance, will reduce both; • Extant EU Member States, selectively interpreting 1321-2014's AMC &amp; GM to suit, and • Create 'less undulated' playing fields throughout Europe - across 66.A.30 'Basic Experience', 66.A.45 'Endorsement with Ratings, 145.A.30 'Personnel', 145.A.35 'Certifying / Support Staff' and 145.A.48 'Performance of maintenance' Implementing Regulations.</p> <p>1. Industry-wide recruitment of personnel educated to nationally defined standards (assessed and accredited to Part-66 Basic engineering levels of Maths and Physics) will establish a reference datum, against which basic aviation engineering knowledge of Part-66 Appendix I (Modules 3 to 10) adequately captures both state of the art and current technologies used throughout the aviation sector. Category A level of awareness will be realised throughout 'Limited &amp; Simple' Task training, assessment, accomplishment and recorded Task / work experience following either national apprenticeship completion or transferring from another industry. Category C level of awareness for Initial Certification Maintenance Steering Group (MSG)3 'Structurally Significant Item [SSI]s and Maintenance Significant Item [MSI] architectures / aircraft Type-</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>specific OSD particularities, will be realised throughout Airline or MRO / Part 147 Academia affiliated training, examination, assessment of attested Category B level of organisational OJT and Logbook recorded work experience (to gain familiarity with organisational processes, policies and standards).</p> <p>2. Category B level Personnel's subsequent Part-66 Modular study (MTOM, CMPA &amp;/or non-CMPA, Piston, Turbine, Fixed Wing, Rotary, Hybrid or Electrical, as appropriate) and state examination (in-parallel with approved organisational practical task accomplishment, assessment and attested work experience records within each individuals OJT Logbook) demonstrates Part 145 'Task specific' maintenance competency (defined above), together with any Type specific (OSD Particularities) – via Approved 147 Training Certificates of Recognition. Risk reduction, via both [Part-66] State examination (basic License issue) and Organisational [Part M, Subpart F and/or Part-145 – transferred from extant 66.A.45 AMC &amp; GM for organisational Certificate of Authorisation issue] Task / Type-training (as appropriate), concludes that no EASA Member State Part-66 basic Aircraft Maintenance Licence confers any certification privilege onto the holder. Such licences must always be used in conjunction with a certification authorisation. Personal experience highlights that no matter how good any “training” might be, unless it results in appropriate practical behavioural characteristics in the workplace - the proverbial goal, will never be scored. AMC &amp; GM to both Part's 145.A.60 Occurrence Reporting and 145.A.65 Safety &amp; Quality Policy and Maintenance Procedures will highlight tasks that are particularly vulnerable to error, providing 'return of experience' feedback onto national airworthiness authorities. Part-66 AML Categories A, C and (eventually) B License holders (having gained associated organisational experience, qualification, personal familiarity and Logbook OJT attestation, acceptable levels of both professional competence, self-confidence and attitude) concludes in certificate holders possessing full capability to issue 'informed' certifications that are within the limitations specified on their individual company authorisation certificate. Stay safe (in any case) and Best Regards, AvcatABC Joint UK CAA License No. UK.66.229844J</p>	
13	Royal Netherlands Aviation Organisation	<p>2.1 Again: in 2016 the L1 and L2 system were not in force. There was no feedback at that point in time to L1 and L2 based on field experiences. So this common statement is incorrect.(a) does not apply to (powered) gliding, is not a valid motivation for change in general(b) on the job training in a club is the standard practice in the gliding scene for as long gliders have been in use. So what is the difficulty?(b)(i) does not apply to (powered) gliding. As a matter of fact maintenance for gldiers is performed in clubs by members and released to</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently,</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>service. The members are volunteers, working in weekends. It is standard practice to learn on the job (peer to peer). Members/volunteers in gliding clubs performing maintenance often are highly qualified engineers who are in their regular work are designing, installing and maintaining all kinds of technical systems and products. Furthermore regulations should reflect the simplicity of (powered) gliders. Glider maintenance is NOT ROUTINE WORK ON VERY COMPLEX AIRCRAFT AND SYSTEMS. Glider maintenance is rather very simple maintenance of a varying nature. Example: leak testing an altimeter is simple and a fairly frequent activity. A repaint job or overhaul is simple but needs proper preparing (project management) and is not routine (happens every decade).(b)(ii) Correct. The AMC is wrong. It tries to define all possible activities. Limit the list, remove stupid items (like airconditioning). The regulation should approach the matter at a different level. The more important competence is is an AML or candidate can assess the job on hand. Is he/she capable (tools, materials, environment, manufacurere instructions, CS-STAN, experience), can he/she make a paln to perform the job (look at the overhaul example under (i)).(b)(iii). This is an issue when looking at the current L licencenses in place (L1, L1c, L2,L2c). It is not so much an issue to find OTJ training options in clubs, rather the L1 L2 systems is poorly choosen. We propose to change this as follows (5 endorsments in total):&amp;gt;L1 C= composite structures including airframe of powered gliders)&amp;gt;L1 W= wooden and steel tube structures (covered with fabric) including airframe of powered gliders). Some clubs still operate wood/metal constructions. There is a strong sub group taking care of vintage gliders.&amp;gt;L1 M= metal) structures including airframe of powered gliders) Metal gliders are dominant in some countries and not in others. So if you are active in a club without metal glider otj training is difficult.&amp;gt;L1 E = engines, propellers, related instruments&amp;gt;L1 ARC = privelege to perform an Airworthiness Review and issue and ARC (change ML.A.901 as well)Remove the obligation to renew the license every 5 years and to renew the ARC privelege every 5 years. This is only additional paperwork, no addded safety as the organisation and staff reissuing the license are clueless about skills and competences of the AML holder. Look at part S-FCL, SPL licences including instructor licences are valid for life! AML licenses for gliders should also be valid for life. Skills and competences should be verified in different ways than controlling checklists by clueless office clarkcs.(b)(iv) proportional should be the hours worked to be able to apply for a license. The requirements are unrealistically high. It also assumes that when the license is required the candidate is an expert. It is like with a drivers licence or pilot license. As long as you drive, fly, maintain you learn new things. To get new AML holders and have</p>	<p>creates duplication of administrative efforts;                      — reduce the deficit of the practical skills of maintenance staff; and                      — update the basic knowledge syllabus.                      A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.                      However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module:                      NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.                      But following other discussions within the review group (RG) of RMT.0255 ,the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.                      OJT                      In Part-66 the acronym ‘OJT’ refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.                      ‘Recency’ requirements for L licences                      EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).                      However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.                      Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes.                      It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>follow up for the aging AML holders the entry level should be achievable for any car mechanic, appliance repair engineer, bike repairman, etc. The tresshold is now extremely high (a lot of theoretical non-sense to be examined in modules 1-12, no study material.) And after the theoretical barrier therse is an enormous OTJ barrier. It prevents volunteers to spent so much effort. As a result glider maintanance in clubs with volunteers will die. Is that the intention of EASA/RMT?(c) This is not a valid argument. As far as gliding is concerned their is no proof of this statement. Again look at the driver license. After the license is issued a car driver matures and develops from novice to expert. There is no reason to make OTJ and practical training more difficult and even more impossible to achieve. (d) MAYbe EASA rule makers should follow a different approach and stop trying to write down long lists of items. An other example: take CS-STAN: this is becoming a thick pile of pages. Alls standard changes can be replaced by a few lines of text. Something like:Modifications to gliders are allowed as long as they do not interfere with controls, structure, aerodynamic behavior. Weight and balance limtis should be within TCDS limits. All parts should be firmly fixed (10G), should not block entry/exit, field of view, may not interfere with other systems.last point: what and from whoms perspective and why? Identify the safety risk from a holisitc perspective.2.2: Also consider the BASIC regulation stating that EASA regulations should not be more complex or limiting than national regulations they are replacing. Also consider the roadmap general aviation: lighter and more proportionalThe changes introduced by this NPA move in the opposite direction (more complex, more limiting). NOTE the Part 66L1,L2 and ML regualtions in palce today are already more limiting than we had prior to Part 66/ML.2.2. (a) is not a problem in the gliding world. Improve the licensing for L1 as indicated above under 2(b)(iii) and all is perfectly solved.2.2.(b) this is an incorrect statement. First define the level of quality and then establish the shortcomming and deal with them. This is a detail level that should not be in regulations. It is probably driven by CA's that think they are not in control because theis checklist does not cover all the items tehy can think off.We feel that for gliding there is no quality issue, as less than 1 % of incidents are maintenance related. So EASA does not gliding safer with stricter rules reducing 1 % to 0,5 %. The overall number of occurances with gliders remain the same.(c) This is nonsense. Be factual. OTJ is the standard training method for past decades in glider clubs in The Netherlands (and probably in mayn other countries). The requirement for self trained L1 and L2 is already in place in Part 66. Candidates have to work trough a long list of OTJ tasks to be performed under the supervision of qualifed engineers and document the work with workorders. This is already</p>	<p>there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>more evidence than was required in teh national system. And the national system has proven over the years to be effective. So more complex, heavier, stricter rules are uncalled for. At least for gliding (L1,L2).(d) Indeed EASA has to publish a question data base for Part 66 L1 and L2 (with help of the glidingsector if EASA does not have the inhous competencies or skills). The question database should be public. EASA also must develop study material for candidates, so that they can prepare themselves. Take an example of the US FAA. By doing so EASA creates a level playing field. EASA also avoids that 27 countries are trying to invent the wheel. All of cours a bit different. Thus we are not in a level playing field (Basic regulation?). For gliding start with defining the tasks to be performed to keep a glider airworthy. Annual inspections, special inspections, repairs, modifications, working with AMP, documents, workorders, adminstration. Use manufactures maintenance and repair manuals as a basis. Than you come to proper competences, skills and knowledge definitions. Than you can define study material (books, video's) and examination levels (knowledge, skills, attitude). Involve staff usde to devolop lerning materials from school or universities (from Part 66 it becomes clear that education is not an expertise of EASA).2.3 (a) not an issue for gliding2.3 (b) OTJ is the common standard for decades in gliding. There is no issue.2.3 (c) The obligatory practical assesment for L1,L2 IS NOT ACCEPTABLE. There is no proof or evidence that there is a problem in the Netherlands with OTJ and issuing a license without practical assessment. The practical assement module 13 for L1 and L2 only adds cost and no improved safety. The proposal itself shows that the RMT has no feeling for the glider scene and teh way maintenance is performed, people are trained, and the simplicity of (powered) gliders. The introduction of module 13 L in conflicting with simpler, lighter and more proportional rules for Gliding (Roadmap GA). The porposal is also conflicting with the basic regulation: EASA rules shall not be more limiting or restrictive than national regulations they are replacing).2.3(e) do not make life to complicated as far as (powered) gliders are concerned. Electrical propulsion is much simplers. The risks are burning batteries (similar to burning AVGAS), High voltage = risk of electrocution. Further Electric power is much simpler and by far more maintenance free. Repair is based on swapping modules. We would plea that people holding a degree in electrical engineering or are active in the installation, servicing of electrical installations or system can get electrical systems endorsed in their licence on the basis of "grandfather right" or "equal competences" proven in another environment. 2.4 EASA RMT definition Expeted benefits.(a) In gliding we have no problem, so there is no benefit to be expected.(b) In gliding we have no problem, so there is no benefit to be expected. The proposal of the RMT</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>makes more paperwork and make life more complex. Maybe the suggestions of RMT work for large aviation and A,B,C licenses. Perhaps this is again a trigger to decouple the L1,L2 system for gliders completely. Deregulates gliding, or make turn glider maintenance in a specific set of rules on two pages A4. At best the RMT takes the time to sit with us and adopt OTJ to fit the competencen required instead of applying an OTJ system derived from larger and complex aviation. Adopt the L licencing system to L1C (composite including powered gldiers, L1 M (metal including powered gliders), L1 W( wood....), L1 E (engines....), L1 ARC (airworthines review and ARC for all gliders, powered/ unpowered, various constructions).(c) We are absolutely in disagreement with the RMT conclusion to involve a 147 for OTJ training for glider staff and also a practical examination. This is a solution for an non exiting problem. There is no business case for a 147 (no volume no money). A volunteer in club will not spent a lot of time or money for a 147 training and examination. The drawback is clear: more cost, more paperwork, even more restrictions for volunteers in clubs to obtain an L1 or L2 license. This is clearly conflicting with experience from the past with the national system in the Netherlands. It is also in conflict with the roadmap GA. It is also in conflict with the basic regulation (EU rules should not be more restrictive than national rules they replace).(d) YES there is a drawback: Being unnecessary work processing documents; we are wasting scarce time and resources!The issue here is that we have had hardly any experience with Part 66 L1L2 since it was introduced. We have been working now for three years with the CA to get approval to perform exams for module 1-12 L. Now there is a RMT that was initiated in 2015 coming with changes. The drawback here is that the RMT and EASA seem to forget that every single letter chnged in regulation affect people and organisations in 27 countries. The poor quality of initial regulations (not first time right) result in a lot of fairly pointless work al over Europe. With all the changes EASA_RMT is introducing we are afraid that the hassle with the CA starts all over again... Not a very appealing thought. We rather fly or drink a beer (maybe that si also an idea for the rmt?).The fact that we are writing thes detailed comment to poor regulation proposals which are not based on facts or discussions with us, is a waste in itself. Both EASA-RMT an we could have used our time much better by being more efficient. This costs days, with limited results.2.4(e) There is a drawback: more paperwork and that times 27 times the number of people and organsiations affected.....</p>	
14	Royal Netherlands Aviation Organisation	EASA RMT writes:As regards 'Objective b': The proposal to include OJT in the AMOs'scope (Part-145 or CAO), allowing AMOsto issue a certificate of recognition (CoR), was discarded. The core business of a maintenance organisation is not to	Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>provide training; therefore, the inefficient implementation of the OJT might affect the complete approval of the organisation and impact the bilateral agreements, including compliance with the ICAO provisions. In addition, the competent authorities of the maintenance organisations would need additional resources qualified for the OJT approval. The potential benefits could be achieved through other solutions. The glider clubs are used to OTJ training performed by individuals being licensed engineers. This worked fine for decades this system must remain in tact. On the job training for L1 L2 must remain possible in clubs and it must be possible that training is provided and signed of by individual L1,L2 holders.The OJT requirement has always been a complicated issue. It is considered the last opportunity for the authorities to check the competencies of the candidate that are necessary to work in real operational scenarios, evaluated on the first aircraft type to be endorsed in the candidate’s licence. the text above suggest that the CA have no trust in the citizens and want more control. This may be realted to the fact that most CA's and their staff spend a lot of time behind the PC, where they should be in the field to see how things are going.There is no prove that as far as gliding in the Netherlands is concerned that we have a safety problem. The CA may have a control problem, they may feel insecure and they may feel that they are getting blamed in case of an incident. Well I have news for the CA. A two day practical examination does not improve quality of the candidate or safety.The system in place for the national license worked fine for decades and was even simpler than the requirement in the actual version of Part 66. With respect to the previous national system the EASA PART 66 system is more paperwork, more forms, and breaths less trust in the quality of trainers and people being trained. An additional two day examination may give the CA the idea that they are in control and have a good assessment of a candidates qualities and qualifications. But this of course is non-sense. A two day assessment give some idea about a candidate but does not give a complete insight in a candidates competenses and skills. Many aspects of glider repair and maintenance cannot even be tested in two days. For instance: to change a tire of glider one already needs a day and an assistant (or two). To review an AMP and all related documents one easily spends two days. So a two day exam is nice thought. Nice for the CA to place a checkmark on their check lists, but not really relevant to measure the qualifications of a candiate. According to the above, the OJT requirement naturally lies between Part-66 and Part-145/-CAO and this duality is the principal cause of complications because different authorities are involved in diverse approvals.As far as gldier mainteance in the Netherlands is concerned (and probably many other EU countries). The above statement/conclusion by the</p>	<ul style="list-style-type: none"> <li>– facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’;</li> <li>– enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>– reduce the deficit of the practical skills of maintenance staff; and</li> <li>– update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: OJT In Part-66 the acronym ‘OJT’ refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>‘Recency’ requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>RMT is not true. We have no complications and no issues. We are also dealing with one and the same authorities. RMT writes: Stakeholders are invited to provide any other option for the OJT and justify it. In particular, EASA would like to explore other scenarios such as the following: a) Remove the OJT requirements from Part-66 and move them to Part-145 under point 145.A.35 'Personnel requirements' where the AMO shall ensure that maintenance staff have adequate competencies with regard to the aircraft maintained by the organisation; or b) Transpose the OJT requirements from Part-66 into Part-145 under the organisation qualification scheme. In both cases all the evaluable principles of the OJT will be kept to enhance the competencies of maintenance staff. AS explained above: In glider maintenance and on the job training there is no problem. It is just how we have always operated and how we like to continue this. OJT is one of the competences of glider clubs like training is another. It is common practice that new AML candidates are trained by individual AML holders to become qualified engineers /AML-holders L1 L2. The system in place has worked for decades. We have no problem, there is no safety issue. NO CHANGES should be made. EASA and RMT should not create a problem that does not exist! Question on Electric power and licenses It looks as if CA is getting a cramp by electric propulsion. It is really easy if you think about it from an engineering perspective. Especially in the glider scene it is simple. What is changing with electrical propulsion? Propeller remains similar (perhaps less wear due to smoother running of an electrical motor) repair and maintenance of an electrical motor. This is much simpler than a combustion engine. There are no parts that wear and need frequent checking (spark, plugs, pistons, oil filters etc). Cooling is important (but similar to combustion engines). Further the electrical motor is a replaceable module, not something to be repaired on component base =&gt; much simpler than traditional engines engine control units are also based on swapping malfunctioning units =&gt; much simpler than conventional motors with carbs, and handles fuel mixtures etc. Batteries are swap only components not really that more dangerous than AVGAS. electrical propulsion is more environmental friendly (no oil, coolant, Avgas) dangerous is the high voltage (100 Volt DC or more, and to a certain extent high currents. So EASA do not make a problem that is not there. Electrical systems are simpler than combustion, easier to maintain, easier to find faults, less sensitive (more reliable). In our view every L2 can be authorized to work on electrical systems for powered gliders. Every bachelor of Engineering should be given the endorsement in his AML. Every engineer repairing, installing installation in the process industry or Tesla repair mechanics should get this endorsement without any additional test or training. If EASA RMT</p>	<p>of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>wants to make a judgement on E propulsion and additional training requirements: Then just read the maintenance and repair manuals of some electrical powered gliders in service (like Antares, Schleicher, LAK, Schempp Hirth). In these manuals you find the answer if additional training is necessary and if yes what. In the Column Drawback there are several assumptions not based by facts. The RMT even uses the term "Expected". May be the expectation is not correct. Which might be true as no member of the rule making team represents the gliding sector or seems to be involved actively in gliding.</p>	
15	Royal Netherlands Aviation Organisation	<p>GM 66.A.5 Aircraft groups (ref table above) Now that we in the glider scene are confronted with Part 66 and ML we run into unwanted side effects and hope the EASA RMT is open for changes. Some history. In the national system there was no different category for powered gliders or gliders. We had a rating for airframes, engines+propellers, and avionics (comparable level as B2L). Why was this system in place, well quite logically engine mechanics were normally the same folks that work in automotive, truck, motorcycle, agricultural machines industry. So they took the experience from their normal jobs and used it for their hobby (with a few extra's). The avionics guys are generally Bachelors or masters in electronic engineering. Since the conversion we all have an L2 license with limitations for ELA-1 and engines/propellers, turbine, electric propulsion and some variations. Glider clubs in the Netherlands (but also in many other countries) only operate gliders or powered gliders. Almost no club operates an ELA-1 aircraft. The clubs can provide OTJ training for gliders and powered gliders but not for ELA-1. The other point is that some countries operate a lot of metal gliders, whilst others do not. Owners and clubs with vintage gliders may want the privilege to work on wood / steel tube covered with cloth. OTJ is still possible in many clubs. Other owners like to work on pure metal. OTJ for metal is not abundant everywhere. Assume somebody wants to get an L1 or L2 or the only acceptable variants L1c or L2 c. What happens....&amp;gt; OTJ for metal is not possible everywhere (may be different in other countries) ==&amp;gt; a new candidate can not become an L1, because he cannot obtain OTJ metal experience&amp;gt; OTJ for ELA-1 is not possible ==&amp;gt; a new candidate cannot get an L2 or L2c while OTJ training for ELA1 is not available. to overcome the problems in the present definition of Part 66 L1 and L2 we propose: Also see paragraphs: Ref. 66.A.3 (f) license categories, GM66.A.3, GM66.A.5 Aircraft groups 66.A.20 Privileges (a) 6. For gliders a Part 66 L1 license exists. The system in place should be changed to the following categories: L1C composite (including airframes of Powered gliders) L1W wooden constructions (like K6, K2, Grunau babies) and metal tube fuselages (like: K-8, K-13 types) (including airframes of Powered gliders, like SCheibe SF 25) L1M metal</p>	<p>Noted. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>(for constructions like Blanik, Calif Caproni)including airframes of Powered gliders) L1 E, engines and propellers.L1 ARC, performing the airworthiness review and issue an ARC for all (powered gliders). Thus not limited to only composite. ML.A.901 must also be changed as this is by far to restrictive and unpractical.A glider technician can have one or more of the above 4 options in his licenseo A glider technician with L1, or L1 C, L1W or L1M should be allowed to work on airframes and issue a CRS for powered gliders (C, W, M).The other alternative to the L1 E engine rating is to introduce L-2 with the limitation gliders only. In other words, an L1 (C, W, M) can get the engine rating for powered gliders in the form of an L2 (C,W, M) limitation “gliders only”. L1(C,W,M) of course is also valid for the airframe of powered gliders.EASA may also reconsider the difference between L1 and L2 (and sub ratings like c or C, W, M). Why is there a difference? Why is an L2 supposed to include aan L1? We understand that the design requirements for CS-22 and CS-25 differ. But there is really no difference in repair, maintenance, inspection and release to service. Really try to explain to anybody why the converted Dutch L2 holders with limitation: “Only gliders” can work on and issue a CRS for a Diamond HK-36 touring motor glider but not for a Diamond DV20 Katana (ELA-1). Why can we repair a cowling for a motor glider but not for a Robin DR-400? Is this another “the earth is flat example”? See also: AMC 66.A.20(b)(2) Privileges item 2</p>	
16	Royal Netherlands Aviation Organisation	<p>66.A.20 Privileges (b) The text under item 1 in compliance with the applicable requirements of Annex I (Part-M) and Annex II (Part-145); and is incorrect. Part 145 only applies to maintenance organizations and not to individuals exercising their rights according Part 66 L1, L2. Further since the introduction of ML (powered) gliders are subject to ML and not M (= large, commercial, complex). Please correct this paragraph for Gliders and L1, L2. The text under item 2 and AMC 66.A.20(b)(2) Privileges in the preceding 2-year period he/she has, either had 6 months of maintenance experience in accordance with the privileges granted by the aircraft maintenance license or, met the provision for the issue of the appropriate privileges; and this text is not appropriate to gliding activities performed on a recreational basis in a club. Solutions: To add to the AMC: 6 months of continuous employment within the same organization; or 6 months of continuous membership of a non profit gliding club (a gliding club being an organization) or for independent certifying staff with an L1 L2 license active as volunteer in a gliding club and member: a minimum of 5 days in the workshop annually and one annual inspection. REMARK: the currency requirements in Part 66.A.20 for an L1 L2 volunteer in a club working on simple gliders is ridiculous. The RMT group drafting up this text has applied a minimum</p>	<p>Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>requirement that fits professionals in a 145 setting. For L1 L2 there is no relation to risk involved or safety issues. The requirement for L1 and L2 is complete out of proportion and is not substantiated by facts or evidence (why = 100 days safer than 10 days or 5 days?). Remark: the text in AMC 66.A.20(b)(2) is incorrect as it only refers to M.A.801. It should also refer to ML. GM 66.A.20(a) Privileges (1) Remove this paragraph. AML holders are not a bunch of ignorant toddlers. Take us serious and remove this crap. Anyway the first paragraph of AMC 66.A.20(b)3 Privileges covers this aspect.. Simple test means a test described in approved maintenance data and meeting all the following criteria: — The serviceability of the system can be verified using aircraft controls, switches, Built-in Test Equipment (BITE), Central Maintenance Computer (CMC) or external test equipment not involving special training. — The outcome of the test is a unique go – no go indication or parameter, which can be a single value or a value within an interval tolerance. No interpretation of the test result or interdependence of different values is allowed. — The test does not involve more than 10 actions as described in the approved maintenance data (not including those required to configure the aircraft prior to the test, i.e. jacking, flaps down, etc, or to return the aircraft to its initial configuration). Pushing a control, switch or button, and reading the corresponding outcome may be considered as a single step even if the maintenance data shows them separated. AMC 66.A.20(b)(2) Privileges item 2 states: For category B1, B2, B2L, B3 and L, for every aircraft included in the authorisation the experience should be on that particular aircraft or on a similar aircraft within the same licence (sub)category. Two aircraft can be considered to be similar when they have similar technology, construction and comparable systems, which means equally equipped with the following (as applicable to the licence category): — Propulsion systems (piston, turboprop, turbofan, turboshaft, jet-engine or push propellers); and — Flight control systems (only mechanical controls, hydro-mechanically powered controls or electro-mechanically powered controls); and — Avionic systems (analogue systems or digital systems); and — Structure (manufactured of metal, composite or wood). If the RMT is of the opinion that two aircraft are similar based on the definition above, then L1 = L2 and L2 = L1. The whole system of L1/L2 can then be simplified and limitations removed. Which is logical to any engineer, although the design rules for gliders (CS-22) and ELA-1 (CS-25) are different, the materials, components, instruments, engines, propellers are all the same. A qualified engineer for a glider can as well repair an ELA-1 and vice versa (or install a radio or change a tire etc.).</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
17	Royal Netherlands Aviation Organisation	<p>66.A.25 Basic competency knowledge requirements EASA RMT formulates: The examination shall comply with the standard set out in Appendix II (applicable to B1, B2 and B3 licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by: (i) a training organisation that is appropriately approved in accordance with Annex IV (Part-147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory. We protest to this examination construction for (powered) gliders. This is not proportional (GA ROADMAP) and it is in conflict with the basic regulations (EU rules shall not be more restrictive than national rules they are replacing. There is no evidence that OTJ training in clubs is insufficient. It worked fine for many decades and it will continue to work fine. As stated before: a 147 has no business case. Too few candidates! the competent authority has no staff and charges € 160 per hour + travel + preparation =&gt; € 3000. This is out of the question for a hobby license! Another organisation. We have gone this route for modules 1-12. It is a disaster. It took more than three years. Manuals and procedures are never good enough. The fact that EASA did not publish study material or a question data base is ignored. The fact that there are many idiotic knowledge points (like air condition) in the modules is also undiscussable. We are very very very afraid that if this route is pushed down our throats we again a busy with forms for another three years. a two day exam is not practical and does not give a good picture of a candidate abilities, character, competences, skills. (b) and (c) The applicant for an aircraft maintenance licence, as regards the addition of a different subcategory, shall demonstrate by examination a level of knowledge that is appropriate to the related subject modules in accordance with Appendix I (for B1, B2 and B3 licences) or Appendix VII (for L licences) to Annex III (Part-66). Appendix IV to Annex III (Part-66) details the basic knowledge modules of Appendix I (for B1, B2 and B3 licences) or Appendix VII (for L licences) required for the addition of a new category or subcategory to an existing Part-66 licence. (c) An applicant for an aircraft maintenance licence in addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority. The EASA RMT proposal is not acceptable for the Glider Clubs in the Netherlands. There is no factual need to change the current OTJ training. There is no proof that the EASA proposal will improve either safety or quality. The proposal only adds more paperwork, more bureaucracy, more cost.</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p> <p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes.</p> <p>It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t.</p> <p>Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>The only advantage is that the CA have an other checkmark on their list and can put the responsibility and blame on somebody L. A two day test is representative for the quality and competence of an L1. Before somebody in an RMT writes such a proposal, you should first test the idea. Go to a glider club and do a two day assessment. What is the result? What has become better, clearer etc? Do not come to us with proposals that threaten the pure existence of our HOBBY.66.A.25 Basic knowledge requirements In NPA 2020-12 the term knowledge is replaced by competences. This is OK. The definition of competences is also OK. Unfortunately the rule making task group has not been in contact with the gliding community and has not made a proper assessment of competences required to maintain, repair, inspect and release to service (powered) gliders. Further there is no risk assessment. There is no analysis of the historic situation. There are no identified improvement areas, nor problem areas. Analysis of occurrences and accidents. NOTE: 95 % of accidents are caused during flight or in flight preparation (pilot errors). 5 % of occurrences are design failures, hence AD's. Less than 1 % of failures is related to maintenance errors. A very restrictive PART 66 L1 L2 is not necessary in view of the limited safety issues. It is with great sadness and frustration that we see that Part 66 and continuing airworthiness regulations are more difficult and more complex than previous national systems The NPA 2020 requires for Part 66 L1 and L2 either an examination by a 147 school, the CA or another approved organization. This is totally unacceptable nonsense. This does not fit to our hobby "flying and maintaining gliders" as it took place for many decades without problems. The EASA-RMT proposal makes it impossible for volunteers in clubs to continue with their hobby. This regulation is clearly drafted with only commercial operation in a 145, CAO environment in mind. Nobody in his right mind will ever pay a lot of money or invest a lot a free time to follow a training or examination at a 147 for an L1 or L2 license (a license that rules out commercial use!). Conclusion: a formal training and examination in 147 or otherwise approved organization is not in the interest of gliding clubs and their members. It will be the cause of death of our hobby. Is that the real intention of the EASA RMT? This route is death of the glider technician L1 L2. Nobody will invest an endless amount of time and money. This maybe ok in a professional setting but not in the glider world. The proposal is so out of touch with day to day life in glider clubs that it is probably not in line with the basic regulation (EASA regulations shall not be heavier or more complex than national systems they are replacing!) Furthermore the proposed bureaucratic circus with examination organizations will only lead to more paper, manuals and other overhead nonsense. It is only added cost without added value or safety.</p>	<p>licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Solution: On the job training will remain in place for L1 L2 glider technicians. Just as it is defined in the valid version of Part 66. AMC 66.A.25 Basic knowledge requirements For an applicant being a person qualified by holding an academic degree in an aeronautical, mechanical or electronic discipline from a recognised university or other higher educational institute the need for any examination This looks very nice but we notice that our CA refuse to recognize university (of applied science) diploma's. It would help if EASA just publishes a list with Bachelor and Master Degrees that is recognized all over Europe. It is very inefficient and also disqualifies the competent authorities that deny the acceptance to recognize diplomas issued by the same government (other ministry). In the NPA 2020-12 item 3 It is unacceptable for glider clubs and their members that EASA abolishes on the job training and replaces it with bureaucratic and very costly 147 organizations. This only adds cost and has nothing to do with safety.</p>	
18	Royal Netherlands Aviation Organisation	<p>(e) The applicant may apply to the competent authority for full or partial credits for the basic knowledge requirements for: (i) basic knowledge examinations and practical assessment passed more than 10 years before the application (see point (d)); (ii) any other national technical training, examination or practical assessment considered by the competent authority in order for the applicant to demonstrate the competencies that are equivalent to the standards of Annex III (Part-66). The applicant shall provide evidence of the granted credits or refer to an examination credit report approved by the licensing authority in accordance with Subpart E of Section B of Annex III (Part-66).What strikes us odd is that the CA in the Netherlands can deny accepting diploma's at bachelor /master level simply by stating they have no time to figure out is elvels are acceptable. The arrogant statement is "if you know everything allready just do a new test"EASA must help here by identifying EU accredited bachelor / Master diploma's in aviation, mechanical engineering, electronics, physics, software as compatible.</p>	<p>Noted. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
19	Royal Netherlands Aviation Organisation	<p>AMC 66.A.25 Basic knowledge competency requirements [...] 3. The successful accomplishment of the practical assessment should be demonstrated by a certificate of recognition (CoR) (EASA Form 148) of Appendix III to Annex IV (Part-147) issued by an approved Part-147 organisation or by the competent authority. The practical assessment must be repealed by EASA / RMT for (powered) gliding (L1 and L2). OTJ training and evidence as it was in place till now and in the national system is more than sufficient. More suffocating rules are uncalled for.In the NPA 2020-12 item 3 It is unacceptable for glider clubs and their members that EASA abolishes on the job training and replaces it with bureaucratic and very costly 147 organizations. This only adds cost and has nothing to do with</p>	<p>Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>safety.Item 3 above is incomplete. The RMT proposed a practical examination by:147 (which will never take place because there is no business case)CA ( no capacity, knowledge and very expensive)the approved organisation is forgotten as an option. If EASA RMT suggests as an option an approved organisation, such an organisation must also be able to issue a certificate. If not this would contradict with modules 1 -12 L for which the KNVVL is given the privilege to issue a certificate to a candidate.AMC 66.A.25 Basic knowledge requirements For an applicant being a person qualified by holding an academic degree in an aeronautical, mechanical or electronic discipline from a recognised university or other higher educational institute the need for any examination This looks very nice but we notice that our CA refuses to recognize university (of applied science) diploma's. It would help if EASA just publishes a list with Bachelor and Master Degrees that is recognized all over Europe. It is very inefficient and also disqualifies the competent authorities that deny the acceptance to recognize diplomas issued by the same government (other ministry).</p>	
20	Royal Netherlands Aviation Organisation	<p>66.A.30 Basic experience requirements [...] 2b. for category L: [...] For the inclusion of an additional subcategory in an existing L licence, the experience required by points (i) and (ii) shall be 12 and 6 months respectively. The holder of an aircraft maintenance licence in category/subcategory B1.2 or B3 is deemed to meet the basic experience requirements for a licence in subcategories L1C, L1, L2C and L2. The RMT seems to propose to delete the text above. Why, what is the rationale? There is no safety issue, no data no analysis. It is just another proposal by the rule making to put up another hurdle for glider technicians to expand their license and remove their limitations.The original text should be kept, regulations not be made more restrictive.2b (ii) as derogation ..... This paragraph can be deleted from Part 66 as it is pointless to own a licence without the privilege to issue a release to service. Then one is always working under supervision and can at best only perform Pilot Owner Maintenance.New proposed text by RMT:5. The academic degree shall be in a relevant technical discipline, issued by a university or any other higher educational institution recognised by the competent authority.RMT-EASA to produce a list with bachelor and master degrees that are accepted (including those issued prior to BAMA-structure in EU to be in place but equal or better than current diplomas)New proposed text by RMT:(e) Notwithstanding point (a), aircraft maintenance experience gained outside a civil aircraft maintenance environment shall be accepted when such maintenance is equivalent to that required by this Annex (Part-66) as established by the competent authority. Additional experience of civil aircraft maintenance shall, however, be required to ensure adequate understanding of the civil aircraft</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>maintenance environment. Notwithstanding point (a), experience in aircraft maintenance gained outside an aircraft maintenance organisation that is approved in accordance with Part-145 or Part-CAO may be MUST be recognised when such maintenance is equivalent to that required by Annex III (Part-66) as established by the competent authority. DO NOT LEAVE THIS TO THE WHIMS OF CA. EASA MUST DEFINE THIS TO KEEP A LEVEL PLAYING FIELD. OUR EXPERIENCE WITH CA IS THAT THEY ARE VERY RELUCTANT TO USE ROOM IN LAWS AND REGULATIONS, AND DENY ANY APPEAL TO REASONABLE THINKING AND COMMON SENSE. THE LAW AS INTERPRETED BY CA IS SACRED. Additional experience in aircraft maintenance gained at an aircraft maintenance organisation that is approved in accordance with Part-145 or PartCAO shall, however, be required THIS IS NOT ACCEPTABLE FOR GLIDER MAINTANCE AND PERSONS SEEKING AN I1 I2 LICENSE. THIS PHRASE IS THE DEATHFOR OUR HOBBY. THERE ARE NO 145 OR CAO'S WERE ONE CAN BE TRAINED OTJ FOR GLIDER MAINTENANCE. THAT STRUCTURE IS NOT IN PLACE IN THE NETHERLANDS AND IT MOST LIKELY NEVER WILL BE in order to ensure adequate understanding of the Part-145 or Part-CAO aircraft maintenance environment. THE TEXT ABOVE IS UNACCEPTABLE. OTJ TRAINING IN GLIDER CLUBS BY INDIVIDUAL AML HOLDERS MUST REMAIN. Again a nice example of an RMT that has come with something and found it a brilliant idea without even checking how real is working. Unacceptable!New proposed text by RMT:(g) For the purpose of reducing the required amount of experience, a basic training course without Modules 1 and 2 of Appendix I to Annex III (Part-66) is considered a full basic training course when Modules 1 and 2 are demonstrated by examination or are credited by a competent authority. For gliding L1 L2 a training course should not be implemented. OTJ as we know it is more than sufficient. Further the text above is not SMART (look up the definition and concept of SMART on the web). The text above will make the CA decide to credit nothing (because that means they have to do something and take responsibility for a decision). The CA will force everybody to take all exams.New proposed text by RMT:AMC 66.A.30(e) Basic experience requirements 1. For category A, the additional experience of civil aircraft maintenance should be a minimum of 6 months. For category B1, B2, B2L or B3, the additional experience of civil aircraft maintenance should be a minimum of 12 months. If the licensing authority has established that the experience gained outside an aircraft maintenance organisation that is approved in accordance with Part-145 or Part-CAO is equivalent to that required by Part-66, the minimum additional experience in aircraft maintenance organisation(s) that is (are) approved in accordance with Part-145 or Part-CAO should be: (i) for categories A</p>	<p>assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		and L: 6 months; (ii) for categories B1, B2, B2L, B3 and C: 12 months. AGAIN:for L1 and L2. For (powered) gliders the OTJ training must be possible under the supervision of an independant L1 L2 holder. This text must be changed. It may not limit training to organisations that are not available in the Netherlands.	
21	Royal Netherlands Aviation Organisation	66.A.40 Continued validity of the aircraft maintenance licence 66.B.120 Procedure for the renewal of an aircraft maintenance licence validity (to be adapted also) (a) The aircraft maintenance licence becomes invalid 5 years after its last issue or change, unless the holder submits his/her aircraft maintenance licence to the competent authority that issued it, in order to verify that the information contained in the licence is the same as that contained in the competent authority records, pursuant to point 66.B.120. Problem: EASA is inconsistent in her own regulations. SPL, LAPL(S) licenses, including instructor rating are valid for life. It is only logical that the same applies to Part 66 L1 and L2 licenses. The renewal of the L1 L2 license only adds cost and does nothing for safety or proving the applicants competences. Furthermore the agency KIWA REGISTER) appointed in The Netherlands (to issue and reissue licenses has no knowledge of aircraft maintenance. They can only process papers and cross out checkmarks and are overpriced. This agency adds no value and no safety either. Solution: adopt (a) to read Part 66 L1 and L2 licenses are valid for life. The owner may use the privileges as long as he/she meets the currency requirements. Advantage: this save periodic cost to renew the license and paperwork hassle. The safety level remains intact as long as AML holders are current.	Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.
22	Royal Netherlands Aviation Organisation	66.A.45 Endorsement with aircraft ratings (a), (h), table in GM 66.A.45 AMC 66.A.45(d);(e)3;(f)1;(g)1;(h) Endorsement with aircraft ratings GM 66.A.45(h)2 Endorsement with aircraft ratings For category L, the relevant aircraft ratings are the following: (i) for subcategory L1C, the rating 'composite sailplanes'; (ii) for subcategory L1, the rating 'sailplanes'; (iii) for subcategory L2C, the rating 'composite powered sailplanes and composite ELA1 aeroplanes'; (iv) for subcategory L2, the rating 'powered sailplanes and ELA1 aeroplanes'; PROBLEM: the rating system does not fit well to the real world. As described above the glider scene differs quite a bit from the powered aircraft /ELA-1 world. As things are implemented now: to be allowed to work on powered gliders and issue a release to service a candidate must prove L2 experience on ELA-1. It is almost impossible to find a place for on the job training for ELA-1. Most glider clubs do not own an ELA-1 aircraft. See also the AMC 66.A.45(d);(e)3;(f)1;(g)1;(h) Endorsement with aircraft ratings. A similar issue applies to all metal gliders (like Blanik, Calif Caproni). Solution: Introduce a slightly different category system for (powered) gliders L1 C = composites (including the airframe of powered	Noted. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes < 1.2t. Some members of GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>gliders)L1 W = wood and steel tube covered with fabric (including the airframe of powered gliders)L1 M = metal (including the airframe of powered gliders)L1 E = engines and propellersL1 C, W, M are also allowed to perform inspections, repairs, modifications and issue releases to service on powered gliders.L1 ARC = privilege to perform airworthiness reviews and issue an ARC EASA FORM 15 for all (powered) gliders with any combination of L1 C to E. An alternative to the above is: Instead of L1 E (engines) allow L2-C, L2-W, L2-M, L2 with limitation (powered) gliders only. A candidate would only be required to prove on the job training for engines and propellers used in powered gliders. Another alternative can be to mergeL1 and L2. Although the design regulations are different (CS-22 versus CS25), the equipment, components, materials, engines, propellers are the same. Also the repair and fault finding techniques are the same. It is really the same installing a radio set in a motor glider or ELA-1, or repairing composite, wood, fabric, or performing a 50 or 100 hour inspection. So there is no reason to limit an AML L1 to just gliders. This person is just as competent to repair, inspect and release an ELA-1. Also the other way around is true, but that is already included in L2. GM 66.A.45(h)2 Endorsement with aircraft ratings For subcategories L1 and L2, it is possible to endorse the corresponding ratings with limitations depending on the type of structures covered by the experience gained. However, no limitations are possible for the subcategories L1C, L2C, The ratings on these licences can only be obtained after demonstration.... CHANGE PROPOSAL Allow limitations on L2 and L2 C for powered gliders only. Thus also opening the way to do on the job training for engines and propellers for powered gliders only.Text by RMT:66.A.45 Endorsement with aircraft ratings [...] (i) The endorsement for Group E aircraft, for categories B1, B3 and C, requires the examination on 'Electrical Propulsion' of Module E. The endorsement is limited to the corresponding aircraft category (e.g. electrical aeroplanes for B1.1, B1.2 and B3)..... Not make the same mistake again: EASA to determine and write study material and prepare a questiondata base that should be public.Text by RMT:The table states that for L2/L2C an ELA1 Group E rating is required. The RMT has forgotten a category for E-powered gliders. Or are E-powered gliders considered so simple that no special rating is necessary (see arguments in previous notes). Add the L1 Engine category and include the experience required. Allow OTJ in clubs under supervision of individual staff. Include the Electric propulsion in L1 and or L1C,M,W,E.</p>	
23	Royal Netherlands Aviation Organisation	66.A.50 Limitations Regulation (EU) 2018/1142(a) Limitations introduced on an aircraft maintenance licence are exclusions from the certification privileges and, in the case of limitations referred to in point 66.A.45, they affect the aircraft in its	Noted. EASA would recommend that all the private owners of sport leisure aviation



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>entiretyEASA to clarify:Example: national qualifications were converted to L2. This means work on powered gliders is accepted and a CRS is valid. However the licenses are limited to gliders only (because the national licenses were for powered gliders). To remove teh limitation ELA-1 we need to prove ELA-1 experience. This sounds ok, but the maintenance, repair, inspection, modification, documentation and CRS work for ELA-1 is the same as for gliders. Also materials, components and the processing of materials is the same for ELA-1 and for gliders. So were is the rationale that we need to prove ELA-1 experience (which is the same as the experienced gained on powered glidiers). Please apply common sense and remove the limitation by a AMC.Example:Now take a fresh AML how achieved an L1C. This person is trained and qualified to work on composite gliders. This person should also be entitled to work on and issue a CRS for composite powered gliders. And so on for other constructions.Please apply common sense and remove the limitation by a AMC.GM 66.A.70(d) Conversion provisionsOne more example would be the case where a person holds a pre-Part-66 qualification that covers privileges to release work on composite and metal sailplanes and powered sailplanes, covering aircraft structures, powerplant, mechanical and electrical systems. This person would be issued a Part-66 aircraft maintenance licence in the L2 subcategory, with the following limitations (exclusions): — ELA1 aeroplanes; — wooden-structure aircraft covered with fabric; — aeroplanes with metal-tubing structure covered with fabric. The essential aspect is that the limitations are established in order to maintain the privileges of the pre-Part-66 qualification without comparing the previous qualification with the standard of Part-66 Appendix I and II.Problem: At first glance the above examples seem fair and logical. The rights under the national system are converted to L1, L2 with limitations. The idea is that one keeps the same rights, which sounds fair..... but is it logical (or is this a “flat earth approach”)? If you think about this, it is not really logical at all. In the Netherlands (and most likely other countries) some 150 licensed AML holders with a national privilege for gliders were converted to L2 with the limitation on ELA-1 (or in other words “gliders only”). So the converted licences allow work on powered gliders including the issuing of a CRS as independent staff.Now... what does the competent authority demand if we want to remove the limitation for ELA-1.... We have to prove experience on ELA-1. Here we get to one misconception of the GM: ELA-1 experience is the same as for (powered) gliders: annual inspection is according to an AMP (which is the same for ELA-1 and gliders, either MA.302 or ML.A.302 apply). Inspection, repair, maintenance is the same for ELA-1 and (powered-) gliders. We are dealing with the exact same materials (composite,</p>	<p>coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>wood, metal, fabric). The handling and processing is the same. Components and instruments are the same (radios, transponders, ELT, altimeter, compass). Isn't it strange that the 150 Dutch AML holders have to work on ELA-1 under supervision, to prove that they can do on ELA-1 the same as they can on a glider? For instance the group of 150 may install a radio or transponder in a powered glider. How is that different from an ELA-1? The answer: no difference exactly the same work and the same components, materials, skills, knowledge and competences. So why do we need to provide evidence of competences that we already have and are masters at? This is just a mistake in 1321/2014 and only annoying and frustrating for AML holders. A further flaw is that if one wants to work on powered gliders and wants to get a L2 license from scratch, this person can only obtain a L2 or L2C. Other limitations or variations are not possible. Refer to: AMC 66.A.20(b)2, which states: For category B1, B2, B2L, B3 and L, for every aircraft included in the authorisation the experience should be on that particular aircraft or on a similar aircraft within the same licence (sub)category. Two aircraft can be considered to be similar when they have similar technology, construction and comparable systems, which means equally equipped with the following (as applicable to the licence category): — Propulsion systems (piston, turboprop, turbofan, turboshaft, jet-engine or push propellers); and — Flight control systems (only mechanical controls, hydro-mechanically powered controls or electro-mechanically powered controls); and — Avionic systems (analogue systems or digital systems); and — Structure (manufactured of metal, composite or wood).</p> <p>Solution: accept conversion from a national AML (powered) glider license to a Part 66 L2 without limitation for ELA-1. Instruct Competent authorities accordingly, and have licenses adopted free of charge to include ELA-1 and remove the limitation. CA to revise the Conversion Report accordingly (adopt and change 66.B.300 and following paragraphs were necessary).</p>	
24	Royal Netherlands Aviation Organisation	<p>We did not review or comment the 66.B paragraphs as they apply to the competent authorities. However many remarks we made with Part 66 A and the NPA 2020 do affect the Part 66 B. It is up to EASA - RMT to change the paragraphs in B accordingly. REQUEST: Keep regulations simple and stupid. Do not try to formulate unnecessary paperwork or for forms to deal with non-existing problems. Quite a few changes in this NPA seem to be driven by the fear of CA that they are not in control. Before drafting complex and unnecessary regulations, first we should ask ourselves a number of questions: * why is there a problem (no problem, no regulation required. Example: the fact that a CA feels they are not in control is not a problem that should be solved with more restrictive regulations for the glider</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>flying sector. The feeling of insecurity should be approached by involving the CA with the sector: look for facts (are there any safety occurrences reported?, did the CA during inspections find any issues?). If there are no safety issues due to maintenance and annual inspections, than regulations are not necessary and they will not help. The CA may feel they are more in control, but the gliding scene does not become any safer, only more restricted.* what causes the problem (root cause)* what are the consequences (try to qualify and quantify). For instance: something that happens often but does not cause a problem in glider flying does not require any measures (like tire pressure: a bit too high or low will not be life threatening). On the other hand: something imposing a great threat, but that does not take place often (= really an odd incident) does not require action either.* who can Anyway:GM 66.B.200 Examination by the competent authority (b) All the questions should be of the multiple choice type with three alternative answers. Can EASA explain why three alternatives? For FCL there are 4 answers? PROBLEM: for L1, L2, EASA determined knowledge areas to be examined. These are not derived from competences required for glider repair and maintenance, but seem derived from the A, B, C, system for large / commercial aviation and staff working in a 145, MF, CAO and trained in a 147. For L1 and L2 EASA has not published study material and a question database (which should be public by the way). The effect is that in 27 countries CA's or aero clubs are inventing the same wheel: study material and question database. So we are wasting scarce resources and time in 27 countries on something that should have been designed by EASA. We come up with 27 different solutions. So where is the level playing field? Solution: EASA to determine a question database. Subcontract this work to competent AML holders / professional educators/teachers/ lecturers. Look at the USA FAA.EASA to determine competence required for the maintenance of gliders.</p>	<p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>of these modules and new assignment of the applicability for the L1 and L2 licences.</p> <p>Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
25	Royal Netherlands Aviation Organisation	<p>Appendix III — Aircraft type training and examination standard — On-the-job training (OJT)page 140 and onward. in NPA 2020-12. Clarify that this appendix does not apply to (powered) gliders / category 4 aircraft.Take this Appendix III as an example: EASA-RMT try to add so much detail that is almost impossible to understand and comply. The amount of detail only stimulates CA to demand complex Manuals and Exposition and procedures and checklists from clubs and organisations). All this paperwork is driven by fear from CA and EASA that professional trainers and maintenance organizations are not professionals and need to be controlled 5 digits behind the decimal. The consequence is that we are not busy with aircraft and maintenance, but paperwork and forms. NOTE: the same undesirable trend to control everything with checklists is also visible in other area's, like healthcare. A medical doctor spends more time filling in data in his PC than that he is attending patients. Does this lead to better healthcare.....?NOTE: the same applies to EASA, CA, this NPA: instead of wasting a week of precious time to comment an NPA we could have better used this time to train new candidate AML holders and maintain and repair our equipment. Instead of an RMT drawing up rules for us, we should have been defining and drafting rules with the RMT that are suitable for our sector.=====Add a paragraph on OTJ training in glider clubs as it is common standard and has been in place for many decades. Do not complicate or restrict our hobby just by lack of knowledge of our hobby or lack of trust. We do not deserve that!</p>	<p>Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p>
26	Royal Netherlands Aviation Organisation	<p>Appendix III — Aircraft type training and examination standard — On-the-job training (OJT)1. GeneralRegulation (EU) 2018/1142Aircraft type training shall consist of theoretical training and examination, and, except for the category C ratings, practical training and assessment.(a) Theoretical training and examination shallTO be ADDED/ adopted:This appendix III does not apply to (powered) gliders (cat 4 aircraft) and L1,L2 candidates. For L1 and L2 simple in the club OTJ training</p>	<p>Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>must remain possible. OTJ for (powered) glider technicians (L1/L2) shall be based on jobs described in the AMP (which are again based on aircraft maintenance and repair manuals and ICA). Further the work described in CS-Stan can form a basis.REMARK:A flaw in the current thinking in the regulations of L1/L2 is that there is only one level. The authorities want to cover in this level everything. Th real world does not work this way. A AML holder grows in his job, learns from experience. A person with 20 years experience has gained a lot of skills and knowledge while performing maintenance and talking with others and learning from others. The concept of growth from novice to master is not well implemented /conceived.</p>	
27	Royal Netherlands Aviation Organisation	<p>Appendix IV — Experience and basic knowledge modules requirements for extending a Part-66 aircraft maintenance licenceThe experience requirement will be reduced by 50 % if the applicant has completed an approved Part-147 course relevant to the subcategory.RMT to ADD for L1/L2 for (powered) gliders:Also accept courses offered by organizations accepted / approved by CA without compliance to the paperoverhead of a 147. E.g. Trainingcourses offered by Aeroclubs like DAEC, KNVVL, component manufacturers (Rotax).Example RMT writes:Recent experience should be in the subcategory applied for and be 50 % of the duration indicated in the table with a minimum of 3 months and a maximum of 1 year. The remaining experience may be accumulated in any subcategory (66.A.30(d)). Nevertheless, for an initial application, the required experience cannot be less than that established in point 66.A.30.Remark: this may be a perfect text from a legal perspective. However for the average person this is unintelligible (one needs to review many paragraphs and than destil what applies for him/her, only to find that the CA has a different view). Please: EASA RMT = simplify!Table B states:EASA RMT: Add a different module system:L1C = composite (powered) glidersL1M= metal (powered) glidersL1W = wood and metal structures with fabric (powered) glidersL1E = powered gliders and propellersL1 ARC = airworthiness review and ARC for all (powered) gliders. Privelege to L1C and/or, M , W, E). ARC privelege to apply to all types of (powered gliders), even if AML holder has e.g. only L1C or L1M (combinations of course are also possible).Note the above also affects ML.A. 901 and Appendix V — Application Form — EASA Form 19 Regulation (EU) 2018/11421. This Appendix contains an example of the form used</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’;</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255 ,the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym ‘OJT’ refers to a prerequisite applicable to B1 and B2</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
28	Royal Netherlands Aviation Organisation	Appendix VII — Basic knowledge and practical assessment requirements for category L aircraft maintenance licence.EASA RMT introduces a MODULE PRACTICAL ASSESSMENT 13LWe feel this uncalled for and should be removed from the L1 L2 system. It does not improve the quality of the candidate, it does not deal with safety problems or issues. There is no data, no analysis that supports the introduction of a practical assessment. Look at glider maintenance in the decades prior to EASA regimes were in place. We had no issues with maintenance. Al maintenance training in clubs is and was based on OTJ.	Accepted. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Experienced AML work as volunteers in clubs to train new candidates. The EASA regime has over the last decade made (powered) glider maintenance more restrictive and more complex, added tons of paper without any effect on quality, efficiency (or negative effects must count as well), safety, airworthiness. Did EASA/RMT investigate if a module 13L is practical? Did EASA/RMT investigate the effect on quality and safety? Consider: a 147 will not be interested as the numbers are too small and the burden of the paperwork and cost to get approval of CA is too high. Especially in countries with smaller glider pilot communities this will not work. Examination by CA is also not very likely to fly. In our case CA has no staff and no knowledge of glider maintenance and repair, so they are not qualified as examiners. Then there is added cost of some €3000.- per candidate. A CA may appoint e.g. an aeroclub to conduct the exams on the CA's behalf. This is also a very undesirable route. We have this experience with the exams for module 1-12. We are working with CA for three years to get an approval. Manuals and processes seem never to meet their standards. The issue that should be discussed, sensible question, study material etc. is never discussed. As long as we fulfill the demands of the law it is alright, as long as the blame can be put elsewhere in case something goes wrong.... Very undesirable.. Not at all an improvement over what was in place in the pre EASA era.... Please change the module system as the system in place with L1 and L2 is not suitable. Also add a Module ARC and change ML.A.901 to better suit the real world. EASA RMT: Add a different module system: L1C = composite (powered) gliders L1M = metal (powered) gliders L1W = wood and metal structures with fabric (powered) gliders L1E = powered gliders and propellers L1 ARC = airworthiness review and ARC for all (powered) gliders. Privilege to L1C and/or, M, W, E). ARC privilege to apply to all types of (powered gliders), even if AML holder has e.g. only L1C or L1M (combinations of course are also possible). Note the above also affects ML.A. 901 and Appendix V — Application Form — EASA Form 19 Regulation (EU) 2018/11421. This Appendix contains an example of the form used</p>	
29	Royal Netherlands Aviation Organisation	<p>Appendix VII — Basic knowledge and practical assessment requirements for category L aircraft maintenance licence page 162 Appendix VII — Basic knowledge and practical assessment, including the NPA 2020-12 Problem: To start with the biggest issue: The proposal in the NPA to adopt the examinations for the various modules and the introduction of module 13L. This proposal is the death penalty for individual glider technicians seeking an L1/L2 approval. Nobody in his right mind will invest so much time and money in a license that is just useful for a hobby. If anybody wishes to get a license he is better off following a training for A, B or C licenses and start working for a 145, MF or CAO. Than the investment will</p>	Accepted. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>pay off in the form of salary or income.EASA RMT is wrong to presume that 147 schools will implement examinations for a few candidates per year for a 13L module or training. It will cost 147 schools unreasonable time and money to get an approval from the CA. There will not be enough students will to pay the investment. There is no sensible or viable business case for a 147 school. The alternative is an examination by the CA. The CA will also charge expenses. For a practical examination off two days, including preparation and everything (counting just one CA employee), this will cost more than 3500 euro's per candidate. Outrageous!The other option for the practice test according to module 13 is an organization approved by the competent authorities. This is a route we went in the Netherlands for the modules 1 -12. We worked on this for more than 3 years! We made manuals, procedures and forms. Questions, databases, the whole lot. Whatever we made it was never enough and never good enough. No / limited help, no guidance, no examples. Was there ever a discussion about questions, study material, knowledge areas,.....no. We spent three years on manuals and procedures.... Very frustrating.Furthermore the proposal for module 13L is conflicting with the GA-roadmap: proportional regulations, which are tuned with the complexity of the aircraft (gliders and powered gliders).The proposal is also conflicting with the Basic Regulation, which clearly states that EASA rules may not be more complex, limiting or restrictive than the national rules they are replacing.The proposal serves no purpose, there is no need or evidence to change anything or to implement more restrictive regulations.It is obvious that the rule-making group has no clue about glider maintenance, has not been in contact with the European Gliding Union, has not contacted representatives of a national aero club or glider club. The proposal does not fit the real world.Solution: withdraw this proposal and make a new proposal together with the gliding community. A proposal of regulations that is sensible, proportional (meeting the simplicity of gliders and the risk for safety). Make a fact based proposal, not something dreamt up by a rule making group that clearly has no feeling for glider maintenance and has clearly no educational back-ground. Involve professional teachers, lecturers from (technical-) schools.</p>	
30	Royal Netherlands Aviation Organisation	<p>Appendix VII — Basic knowledge and practical assessment, including the NPA 2020-12 page 162Practical assesment should be removed. There is no need. There are no facts or data supporting a safety issue that must be resolved by stricter regulations such as a practical assessment. The two day practical assessment is additional cost and red tape hassle without an improvement of the qualities of the candidate.The modules and knowledge requirements in place and defined by RMT /EASA are more or less copied from the ABC licenses. They may be suitable</p>	<p>Noted. NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>for professionals working in a 145, MF, CAO. This section is clearly not conceived by people with educational experience (professional teachers, lecturers, and examiners).PROBLEM: The knowledge items are not well related to required competences to repair, maintain, inspect and release to service (powered) gliders (and ELA-1 if you like). What are the required competence (attitude, skills, knowledge) of an L1L2 holder?:Professional Attitude: just culture, problem solving nature/ analytical, ability to find faults in a logical manor, knowing his/her limitationsSkills:Being able to identify and find information, materials and tools for jobs to be performed (make a work plan, workorder).Being able to perform an Annual inspection according to AMPBeing able to determine the correctness and completeness of the AMPBeing able to find the proper maintenance documents (ICA, AD's) and read and understand the instructionsbeing able to understand the requirement of PART ML. and being able to apply these to his jobBeing able to make a workplan, workorder, document workBeing able to identify and use proper tools and materialsBeing able to inspect, repair, install, maintain and release:Airframe (composite, wood, metal)Engine, propellerComponents, radio, compass etc. etcPerform and check weight and balanceBased on this list (a quick sample, thus not necessary complete) the knowledge and skills should be determined and accompanying study material (books, video's, OTJ) should be determined and made. And of course a public question data base. EASA EU desires a level playing field, so this material must be made by EASA or controlled by EASA. What is starting point for study material? Start with the work performed in the workshop. Start with the instruction of Type Certificate holders. Then combine this into a study manual to match Group 4 sailplanes and Powered sailplanes including components (definitely not more!): Documents that the study material is to be based upon (aircraft are listed in a.o.):· TCDS instructions· Flight manual instructions· Maintenance manual instruction· Repair manual instructions:Repair of wood, fabric, compositeTM's of manufacturers and other ICA like AD's, instructions by the Agency like CS-StanComponent manufacturer instruction for use, installation, fault finding, repair, exchange of:o Tost tow hookso Hotellier control linkso Winter instrumentso 8,33 kHz radio's, transponders, ELTo Engines two stroke (mainly: Rotax, Solo, all others are similar), four stroke (mainly 4 cylinder boxer concepts base on VW Beetle engines, like Rotax 900 series, Limbach, Sauer, they all are very similar)o Propellers, fixed, adjustable, constant speed (also very similar systems). Focus the module exams and on the job training on the 80 to 90 % main stream activities. Do not include exotic technologies and constructions. The odds are that a L1/L2 glider technician will never in his life come across a jet</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>or two stroke Fisher top. Focus on the competences that a technician can identify his limits and knows how to expand his skills and knowledge to safely perform the odd job if he ever comes across it.</p> <p>Also one should consider the entry level of a candidate. It is stupid to have a bachelor or master student or any other graduate follow the basic module. Please bear in mind that glider maintenance differs from maintenance for commercial of complex aircraft in 145. Gliders are very simple and not really complex. Apart from some routine work there is also work that is not common, not a routine and needs to be managed as a project rather than a routine job. It seems that most A,B training focusses on routine jobs. The routine jobs for gliders are not really requiring "rocket scientists". The more uncommon jobs require other skills (project and planning competences). Examples are: recovering a fuselage (overhaul), larger repairs to the airframe, swapping an engine. Other jobs and tasks have only become simpler (as in many other fields outside aviation). Components have built in self test and are on replacement base only. Modern electronics (radio's, transponders, ELT etc) cannot be repaired in the field. So instead of higher demands for higher qualifications, AML's only need less knowledge or skills. Solution: Introduce a separate system for (powered) gliders only. Adopt the AML privileges or ratings into L1C, M, W, E, ARC as explained earlier. Define competence, develop training material and a public question database. Or completely deregulate (powered) gliders.</p>	
31	Royal Netherlands Aviation Organisation	<p>Appendix VII — Basic knowledge and practical assessment requirements for category L aircraft maintenance licence page 162: Comments Please change the module system as the system in place with L1 and L2 is not suitable. Also add a Module ARC and change ML.A.901 to better suit the real world. EASA RMT: Add a different module system: L1C = composite (powered) gliders L1M = metal (powered) gliders L1W = wood and metal structures with fabric (powered) gliders L1E = powered gliders and propellers L1 ARC = airworthiness review and ARC for all (powered) gliders. Privilege to L1C and/or, M, W, E). ARC privilege to apply to all types of (powered gliders), even if AML holder has e.g. only L1C or L1M (combinations of course are also possible). Note the above also affects ML.A.901 and Appendix V — Application Form — EASA Form 19 Regulation (EU) 2018/11421. This Appendix contains an example of the form used Remove module 1L. This is a superfluous module for every candidate with a master / bachelor degree. Also this module is not necessary for candidates with a vocational degree (European Vocational training Association - EVTA). Think of car mechanics, service and installation mechanics for (industrial) installations. For (powered) gliders module 13 L is not acceptable. There is no argument to introduce this module.</p>	Accepted. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>There is no identified safety issue. No problem, no data, no analysis that a practical assessment solves any safety or skill / knowledge/ competence issue of a candidate. The OTJ training during two years is more than sufficient evidence of required skills, knowledge and competences to work safely on (powered) gliders. The experience gathered over many decades prior to EASA rules being in place and even the first decade of EASA proves this. Stop introducing extra restrictions. REMARK to 13 L practical assessment: It is conceivable that in some countries a module 13 L would lead to a favourable situation. For instance the DAEC in Germany have a long history with well defined training modules. EASA LBA could accept the proven DAEC training systems (which worked to satisfaction for decades). The DAEC system should be accepted without any new EASA or LBA requirements (like compliance with Part 147). In the German example, the DAEC training + a module 13 L examination must then form an alternative to two years on the job training. Page 162: The phrasing is unacceptable for L1 /L2 for powered gliders. There is no business case for a 147 organisation as numbers are too low. Putting up local aero clubs with the need to implement a 147 organisation for L1, L2 for (powered) gliders is unacceptable. The application with a CA for a 147 license is extremely costly (&gt; 10000 euro's), extremely time consuming (may take years), and a complete bureaucratic overkill of papers and forms. The introduction of a 147 and module 13 may sound nice for CA who want a checklist so that they can blame on somebody else when something goes wrong. The 147 construction is completely against the way things work and have worked in glider clubs for decades without any issue. Stop this madness!</p>	
32	Royal Netherlands Aviation Organisation	<p>Page 163 Modules should all be derived from competences, skills and knowledge required to perform: (annual) inspections, modifications, repairs and issue a CRS. Unfortunately the modules and knowledge in place and those proposed in this NPA 2020-12 seem to be derived from large commercial complex aviation and what the RMT seems to think is necessary without verification if a (powered) glider technician really needs this knowledge or is ever being confronted with it. So the list with knowledge items is longer than necessary only driven by RMT/CA to include as much as possible to create a difficult hurdle to take. And of course it is fairly simple to define a long list of knowledge points, but what you should also make is study material at the right level and a question data base that is aligned with the study material. EASA-RMT learn from educators how educational programs are to be developed and skill, knowledge and competence levels that match the requirements for the job to be done. With many on board components applies that we only need to determine if they are faulty or not. Almost nothing is a field repair (we are not repairing resistors, designing circuits involving</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>knwolegde of Kirchhoff, and we are not counting and testingExample: the LBA has a question in Module 12 L asking about the number of channels available in an 8.33 kHz radio set. Of course this question can be asked. But what is the point? Does it make a candidate suitable if he knows the answer. NO.Unfortunately the whole concept with multiple choice questions gets too much focus and status by EASA and CA (CA likes this because they can have their checklist again and feel they are in control). What we are really looking for is the set of competences that make somebody a qualified (powered) glider AML holders. Then you should train and test skills like working with AMP and maintenance documents, Analytical skills (what do we see, what can be the cause how to solve it, where to get help). Make a workplan, document work).Knowledge of e.g. Kirchhoff Law, Color coding of resitors, channels of radio's is completely unnecessary and pointless knowledge. This module can be removed as it is totally superfluous for candidates with a Bachelor or Master degree, a diploma from a vocational educational institute (e.g. car mechanics, carpenters, HVAC installation and maintenance engineers, service engineers of all trades). Als this module is superfluous for every candidate who floowed a secondary education in EU till age 17/18.Considerations:The multiple choice concept introduced by EASA with the limited time per question has a consequence. The only thing EASA is testing in this setting: Can a candidate read and understand a question quick enough. Does a candidate heave sufficient (unnecessary) knowledge active in his brain to answer te questionsIs a candidate experienced enough with multiple choice questions to be able to deduct the wrong answers even if teh candidate has no clue about the question and the correct answer.The EASA multiple choice system is not really suitable to test problem solving skills like mentioned in e.g. 4I3 and 4 (identifying damage, standard repair and maintenance procedures. Same with 5 L3,4, 6L4, 5Other remarks:7L1 theory of flight is really not necessary. As 99 % of glider AML's hold a SPL or follow a training this is not required.7L4 Airconditioning: One only list such an item as knowledge point if he/she never flew a glider. Stupid kowledge point.7L10 Hydraulics is very limited in (powered) gliders. It is found in hydraulic brakes and with motorgliders in differential braking systems. can be combined with 7L127L11 Ice and rain protection== seems also to be copied from a different section of aviation. Apart from drains in pitot static and holes in fuselage and wing structures there is not much rain protection in gliders. Ice ?7L21 transmissions as in engines should be included in 8 L, Transmission as in airodynamic controls should 7L87L25 and 1L5 are a double this should not be covered in more than one module7L27 Abnormal event?8L1 2, 3 are not realy usefull knowledge areas. We are not designing an engine but maintaining and</p>	<p>Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. But following other discussions within the review group (RG) of RMT.0255 ,the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>repairing it.8L11,12,13,14,15,15 Turbine engines are not really of interest to (powered) gliders. There are a few sustainer engines for gliders in the field. All the maintenance is pilot owner. If something more dramatic is going on the unit is send to the TC-holder or an approved workshop. This is typically an item where CA insist that questions are asked about theses items and an AML may never in its life see an glider with a jet engine.8L18 FADEC: is module based: either they work or not and are swapped. FADEC is probably more of interest to large / complex aircraft (not for powered-gliders).12L2 FLARM should not be mentioned here. This way EASA RMT is endorsing a proprietary commercial system. Every incident prevented with FLARM is welcome, but FLARM is a very unreliable system that is known not to work properly (the false sense of safety by a faulty FLARM is perhaps worse than no FLARM at all).Change 12L in transponder and anti collision systems.13L practical assessmentThe candidate shall demonstrate the required competencies while performing a number of maintenance tasks selected by the training organisation or by the competent authority.As mentioned before this practical assessment is unacceptable to us. The introduction of a 147 with all its bureaucratic overhead or the involvement of the CA is not justified in any way. It does not improve anything.In no way should the practical examinations be left to a 147 or CA anyway, as we will see that organisations will follow their own whims. The poor candidates and aeroclubs are left alone in an unequal battle with the CA.The assessment shall evaluate two types of competencies: EASA RMT: your item under II is NOT a competence (involve somebody with educational expertise). Items under I are not formulated as competences. Competences are the combination of attitude (workmanship, skills and knowledge).In other words: e.g. "Documentation" = not a competence, A competence would be: e.g. Can identify the documentation to perform the task identified.I. General competence applicable to every licence category and related to the following aspects: A. Safety precautions — aircraft and workshop; B. Workshop practices; C. Use of tools; D. Use of maintenance data (AMM, SRM, IPC, etc.), engineering drawings, diagrams and standards; E. Documentation and communication. II. Competence relevant to the licence category the candidate has applied forThe above items I A-E and II are all covered in the two year on the job training. Like mentioned earlier. A practical assessment maybe an option In Germany where DAEC runs training programmes. The training program can then be completed by an exam as intended by module 13. But in that situation two years of OTJ should then not be necessary and replaced by e.g. the DAEC training + an EXAM..</p>	<p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
33	Royal Netherlands Aviation Organisation	<p>AMC to Appendix VII — Table of contents page 168 and furtherThe problem we have here is that EASA after introduction of Part 66 L1 and L2 in 2018 is already changing modules and items. It took us over three years of difficult cooperation with CA to finally produce manuals, procedures and fill a question database with questions meeting EASA's 1018 requirements. Per April 2021 we can perhaps conduct the first exams according Part 66 L1 and L2. It is extremely frustrating that EASA and RMT are now without any consultation just changes everything around (again). That causes a lot of unnecessary work. STOP these continuous changes. We are fed up with it. What also is stinging us, is that there is an overwhelming list of all kind of possible knowledge points. Probably figured out by "EASA-RMT champion on making long lists with unpractical knowledge". Look e.g. at module 7L EASA proposes items in 7L that will never be needed when maintaining gliders. It is clearly a list copied from complex aviation. Easy for the RMT EASA, but it will be impossible for a volunteer/ candidate in a glider club to study this. It is not motivation to know of things you will never use. This AMC only increases complexity of the theoretical exams that are not representative for the competences of a good AML L1,L2 anyway. We again strongly suggest that EASA makes a subset for L1 for (powered) gliders. EASA to publish study material that support the knowledge items in this AMC. EASA also to publish a question DATA BASE (which is public). This to enable a level playing field. The way EASA now operates is by throwing the consequences of problems she created over the fence. Now 27 countries and organisations are trying to solve a problem. EASA RMT please come with a complete integral solution, do not publish material that is not complete. module 1 L is superfluous and redundant, should be removed. 1L.3 Electrics AC and DC circuits — Ohm's law, Kirchhoff's voltage and current laws; — Significance of the internal resistance of a supply; — Resistance/resistor; — Resistor colour code, values and tolerances, preferred values, wattage ratings; — Resistors in series and in parallel 1L3 should be a part of 12L Kirchhoff, Resistor colour code, values and tolerances, preferred values, wattage ratings; is nonsense for an AML L1 L2 holder 1L5 can be made part of module 2L Workplace safety is after all largely depending on human factors and responsible behavior. 3.L2 General understanding of Part-M, Part-CAMO and Part-145. An AML L1 L2 for (powered) gliders has no need to know these parts as gliders are Subject to ML, and CAO. 3L.5 Licence privileges and how to exercise them properly (Part-66, Part-ML) Conditions for release to service: — in a maintenance organisation; Release to service in a maintenance organisation is not relevant for an AML L1 L2 for gliders. That is determined in the maintenance exposition of the organisations. (powered) glider technician are working as individuals. 7L.1 Theory</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p> <p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>of Flight — Gliders and Aeroplanes Aerodynamics and flight controls7L1 is not really necessary as knowledge area for an AML. We are not designing (powered) gliders. As most of us are also pilots we already know this as part of SPL theory. So do not exam what is not necessary.WHAT happened to 7L2? it misses a.o. in the AMC.7L3 — Tow hooks (schweizer and tost hook); Remove the type of Hooks. Completeness with odd items is not desirable (there are also others like Fokker and Ottfur CAIR., Tost and Schweizer are with CAPS = company name).7L5: the part electrical of module 1 can be added to 12 L or 7L5.7L.7 Fire Protection and Other Safety Systems (ATA 26) — Portable fire extinguisher; — Rescue systems (safety parachute, recovery parachute, launching systems including safety measures for pyrotechnic7L7 should not be examined. Safety parachutes are not part of the priveleges of AMI L1 L2. Fire extinguishers are not part of glider equipment and not part of AML privilege. ATA 26 is probably just copied from large aviation/complex aircraft. Remove.7L10 ATA29, 7L11 ATA 30, is requiring knowledge that is not applicable to gliders. Probably just copied from large aviation/complex aircraft. remove.8L1 unnessary knowledge. we are not designing engines. Someting similar applies to items in 8I2, 8I3. Also 8L10: we are not designing electrical motors and drive trains. we only need to maintain them according to manuaufacturerers instructions. In 8L a lot of items are nice things you ask about engines and what have you. An AML must be able to perform annual maintenance, 50 hrs, 100 hrs etc be able to indicate faults and decide what to do. Al this knowledge is much more than really necessary or helpful to be a qualified technician.8L 14, 15,16 turbine engines are not common in the Netherlands. We have two selfsustainers, and all is pilot owner maintenance. Clearly an examle from knowledge points figured out behind a desk, without a clue of gldier maintenance.8L17: again: we are not designing propellers8L18 FADEC, not common in gliders12L1 this module is superfluous. We are not designing ELT,RADIO, Transponders systems. We are only allowed to install them according manuaufacturers instructions. In case faulty swap them. 12L2 Flarm should be replaced by airborne warning / anti collision. FLARM is an unreliable and proprietayr system. It is not appropriate to demand knowledge of FLARM! look at 12L3 item — Indications of other aircraft systems; 12L4 This item is not SMART (Ilok up SMART on the web). Remark we are not working in an avionics workshop repairing components (b2L rating/145)13 LLooking at 13 L it is just a list copied from somewhere in commercial and complex aviation and quite unrelated to common practices in (powered) glider maintenance and repair. It is not all nonsense, but quite a lot does not make sense.D. Use of maintenance data (AMM, SRM, IPC, etc.), engineering drawings, diagrams and standards Use of the</p>	<p>be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
34	Royal Netherlands Aviation Organisation	<p>Air Transport Association (ATA) Specification 100 (including ISO, AN, MS, NAS and MIL); Since when is the use of ATA 100 an obligation for glider maintenance?</p> <p>Page 188 Appendix VIII — Basic examination and assessment standard for category L aircraft maintenance licence (a) [...] (vi) a failed module may not be retaken for at least 90 days from the date of the failed module examination; (vii) the time periods required by point 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 and the licence has already been issued; (viii) the maximum number of consecutive attempts for each module is three. A further set of three attempts is allowed with a 1-year waiting period between the sets. Items Vi, VII, VIII cause more bureaucracy and will require us to change manuals and procedures for the examination organisation "as agreed by". Just another example of unnecessary rulemaking. The world would function great without these details. We are doing all the work as volunteers. Please have a bit respect for the work we have to do to try and follow all the difficult rules EASA produces and all the work involved in trying to follow the changes. PLEASE EASA try to do things "right first time". Anyway: items VI and VIII do not need implementation, as we hold no more than two exams per year. (b) The number of questions per module shall be as follows: Why the changes to the number of questions per module? What is the rationale? Which problem are you addressing? Are you aware that in 27 countries we tried to implement all details from 2018/1142? Now by just changing a few digits you create days of work without improving anything. Stop this paper non-sense. (c) Module 13 — PRACTICAL ASSESSMENT The practical assessment shall include an introductory phase where the training organisation, which conducts the assessment, instructs the candidate on the facilities, access to the documents, materials, and tooling. This is unacceptable as it clearly supposes a 147 or similar approved by organisation to be in existence. This is unacceptable. Such a setting is not available in the Netherlands. We are used to OTJ in clubs, upon two years of performing tasks under supervision the candidate should be able to apply for a license (L1 L2) and should be given one. A practical assessment is uncalled for. There is no valid reason to implement this. For decades we have worked with OTJ training. THERE ARE NO ISSUES WITH THE SYSTEM. SO EASA SHOULD NOT CHANGE IT INTO SOMETHING MORE DIFFICULT, MORE COSTLY, MORE TIME CONSUMING, MORE BUREAucratic WITHOUT ANY PROOF OF INCREASED SAFETY OR QUALITY OR COMPETENCES! THIS IS ALSO IN CONFLICT WITH THE BASIC REGULATION THAT STIPULATES THAT EASA RULES MAY NOT BE MORE RESTRICTIVE THAN THE NATIONAL RULES THEY REPLACE. The training organisation or the competent</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>authority shall decide on the group of practical maintenance tasks to be performed by the candidate, and the assessment shall be based on the observation of the candidate's performance while carrying out the tasks.UNACCEPTABLE: NICE TEXT NOT "SMART". FOR A LEVEL PLAYING FIELD EASA HAS DEFINE THE ASSESMENT. ELSE WE ARE LEFT TO VARIOUS INTERPRETATIONS. The practical assessment is considered passed when the candidate has demonstrated adequate proficiency in the practical skills that are required for the assigned elements to the standard that, if performed during actual aircraft maintenance, the aircraft is considered airworthy. A candidate that has worked during two years under supervision and performed all task EASA defined is qualified and does not need an additional test.Three consecutive attempts are allowed. After the third failure to pass, an approved skills training is necessary addressing all the criteria of Module 13L. This condition does belong here. This paragraph deals with the content of a practical exam. The judgment criteria (pass/fail) and the number of attempts are to be written in another paragraph.There is no SMART definition of pass/fail. There is no SMART definition of the exam. If people have to prepare for a two day exam the least EASA is supposed to is to define the exact content and context of the exam. It is unacceptable that the rulemaking team comes with an incomplete proposal that is not tested on its viability, but nevertheless think it does a proper job by throwing it over the wall to CA and sector. Great way to kill our hobby.PLEASE EASA /RMT: justify a practical exam. We have no identified problem? All rules EASA imposes on the sector must also be acceptable to the sector. The rules are there for us. We must be able to comply. Rules should help us to enjoy our hobby. Technical skills — The candidate handles reliably IT systems.Unacceptable: RMT EASA proposes to test something that is not a basic requirement or basic competence to function as a (power)glider engineer. And again the requirement is not SMART. What is meant with "handles reliable"?</p>	<p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
35	Royal Netherlands Aviation Organisation	<p>page 190AMC to Appendix VIII — Number of questions per submodule The tables below show the number of questions recommended for each submodule. Justified deviations from these values are also acceptable, provided the sum of the questions for the submodules equals the total number for the moduleIt must also become possible for the examination organisation and examiners to NOT ask questions about items that are irrelevant for e.g. a qualified (powered) glider engineer L1L2.example of irrelevant items: airconditioning, anti icing, turbine - jet engines, color codes of resistors, aerodynamics, vacuum, pitot heat, flarm, etc transmissions, someting stupid as handling drawings in 7L25, power electronics for motors, fundamentals of radio wave propagations, tranmission lines, flarm =</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>out anyway, glass cockpit, avionics test equipment (= NOT SMART, cannot be examined). etc etc. MODULE 13L — PRACTICAL ASSESSMENT The training organisation or the competent authority shall decide on the group of tasks and the assessment shall be based on the observation of the candidate’s performance while carrying out the tasks. Duration of the assessment: 2 assessment days on tasks selected from the applicable table of the AMC to Appendix VII. ‘1 assessment day’ means at least 6 hours, calculated without breaks. ‘1 hour’ means 60 minutes. AGAIN: there is not infrastructure in the Netherlands to implement a practical assessment as proposed by EASA. 147 organisations are not interested as there is no business case. Candidates will not follow through on this route as it is expensive, time consuming. For a hobby and function performed on a voluntary basis this is completely over the top. The competent authority has no knowledgeable staff, no time and is also very expensive. It is possible for an aeroclub to start an examination organisation. A 147 will cost &gt; 10000 euro’s, a lot of paper and wasted time. For an organisation as agreed by something similar applies (lot of time and bureaucratic overhead). All changes proposed cause a lot of work. Work that does nothing for safety or better qualified AML L1, L2. It is better to drop all the more restrictive changes to PART 66 L1 and L2 all together. Thank the RMT for their effort. Start all over. first decide why glider maintenance must be regulated on a European scale? If it has to be regulated on a European scale, then keep the thing proportional. Make a separate set of regulations for (powered) glider maintenance (max 5 A-4’) Separate (powered) gliders from other light aircraft. Define a different module system (L1C, W, M, E, ARC) Define competences based on the work that takes place during annual inspections and repairs (not based on a long list dreamed up by somebody without in-depth knowledge of glider maintenance) Keep OTJ training. RESPECT what worked in countries for glider clubs for many decades. EASA has not brought any improvement, EASA only brought us more complexity and instability. EASA has not brought more safety. adopt ML.A. 901 to get an ARC privilege as part of L1. Make L1 licences valid for life like SPL. Remove the retest for ARC privilege every 5 years NOTE: for whatever reason CA, EASA almost get a cramp when the Airworthiness Review and ARC form are discussed. The ARC and AR are highly overvalued. AR and ARC do not make aviation safe it is only paperwork and a cash generating tool for CAMO’s or CAO’s as far as gliding is concerned.</p>	<p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences. However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym ‘OJT’ refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>‘Recency’ requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>of these modules and new assignment of the applicability for the L1 and L2 licences.</p> <p>Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
36	Royal Netherlands Aviation Organisation	<p>page 209 Appendix IX — Evaluation method for the multimedia-based training (MBT) Why is this part of this regulation? It is clear the CA are not experts in the field of educations. Fortunately we have a new checkmark list introduced. Developing training materials and training is the competence of specialist. For L1 EASA should dermine training material and also a question database.</p>	<p>Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.</p>
37	Royal Netherlands Aviation Organisation	<p>page 2564. Proposed actions to support implementation As far as we are concerned this NPA 2020-12. goes back to the drawing board. This is a very strange document / proposal. These changes were initiated in 2015. To figure out if there is room for improvement there was an questionnaire in 2016? How was the questionnaire phrased? To whom was it addressed? What was the outcome? Which problems / improvement areas were defined? How was the sector involved? In 2018 the L1 and L2 concept were implemented. The conversion of national AML to EASA was more or less ok. Now that we are working with L1 L2 we see short commings. These shortcomming were of course not visible in 2016 when the equiry was conducted. Short commings Part 66 L1 L2 theoretical module exams are more complicated than the national exams. There are many knowledge areas that make no sense. EASA did not prepare study material, EASA did not prepare a qestion data base. As consequence all 27 EU countries are dowing something slightly different in an attempt to invent the same wheel. This has to be corrected. it turns out to very difficult as a volunteer in a glider club to get an L2. On the Job training for gliders and powered gliders can be arranged. But ELA 1 OTJ is not possible. So it seems better to split up the L1 L2 licencenses differently and dedicate L1 completely to (powered) gliders. Also introduce a different licensing concept L1 C (composite), W (wood), M (metal), E (enginges), ARC (ARC privelege acoording ML.A.901, rewrite ML.A.901). The concept of L1 is not derived from required competences but a derivate of something from large commercial aviation. The whole concept of maintenance by volunteers is=EASA RMT has not been in contact with glider clubs, national aeroclubs, or representatives like EGU</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>(European Gliding Union) or EAS (European Airports). According to the GA roadmap and the basic regulation EASA rules should be appropriate and proportional to the simplicity of the aircraft. EASA rules shall not be more restrictive than the former national rules in place according to the basic regulation. The proposals in this NPA 2020-12 are more complex than our previous national system. The proposal for a practical examination is really showing ignorance and or arrogance. We never had such a thing in place, this never caused a problem. So there is no need to restrict us in our hobby and totally threaten our hobby with extinction. If the proposals of the NPA 2020-12 are pushed down our throats, new technicians will not be interested to overcome the EASA hurdles (theoretical exam, otj, practical exam). In future we are than left in the hands of commercial parties (that may very well be EASA's intention). This would cause an enormous increase in cost (not in safety).The proposals when implemented as proposed will cause an enormous amount of paperwork for part 66 module examinations (re-ordering the data base, rewriting the manual and procedures). We only face instability, not quality not more safety.NOTE: to study this NPA and provide comments we already are investing something like a week of work! On something that is not for purpose, we have better things to do with our time.Before EASA goes one step further with L1L2, talk with National Glider associations or EU-representatives.</p>	<p>assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
38	Royal Netherlands Aviation Organisation	<p>Page 2575. References Part CAO: enable the option in CAO.A.095 (c) airworthiness review and ARC only without the need to also implement maintenance and /or airworthiness management. PART ML: the privilege to issue an ARC as individual AML holder is not described in a way that serves common practice. Consequences of PART CAO Part CAO is successor to the MG regulation in place. The original MF and MG regulation received quite a lot of criticism over the years. EASA has since introduction of the MG CAMO regulation introduced many changes leading to improvement. The sector in the meantime has adopted to MF and MG regulations and has all the paperwork in place and paid all the costly fees to the competent authorities. From the glider flying sector's perspective (and also a number of MG's / MF's serving the glider flying scene) a change to CAO either obligatory or voluntarily is totally pointless. Also the Competent Authorities have to perform a lot of paperwork and are really not well prepared (staff, knowledge, time, cost –inefficiency). Some issues: 1. CAO is not adding any functionality over our CAMO, MG, Uncontrolled environment that we need in order to comply with ML for recreational glider flying. No added value, functionality or safety. Problem: A lot of work for competent authorities, and the sector. All changes need to be communicated and implemented. Initially more mistakes will be made, at best safety levels are not negatively affected Solution: EASA and probably DG-MOVE, EC. STOP the obligation to change to part CAO. Keep MG regulation in place for years to come. Allow existing MG' CAMO organizations to continue as they are. New organizations can of course be made to follow CAO. Simpler for everybody! 2. The change from CAO to CAMO causes a lot of misunderstanding. A lot of work and rework. Support is missing from the competent authority and the Agency. For instance: the conversion from CAMO MG, Uncontrolled to CAO already did cost the Royal Dutch Aero Club more than 100 hours / or close to 20000 euro's. In the end the CAO offers the same privileges as the CAMO according to MG. So this is a waste of scarce resources and time and not contributing to safety at all. Problem: waste of resources, unclarity, lack of support Solution: EASA to issue concept CAE's and procedures that can be followed exactly by CA and the sector. EASA to test and try-out such handbooks and procedures. Thus we can prevent that in 27 countries different organizations are trying to invent the same "wheel". Note: currently we see that some CA are drafting CAE examples. These examples are of course different (this is an example of the "not invented here syndrome"). 3. The CAO regulation seems not to accept the "Uncontrolled" environment as it was possible under MG. So instead of lighter and more proportional regulation we have the opposite. A complication is that the competent authority just follows the law (whether it</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p> <p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>makes sense or it is utter nonsense, strong believers in “the flat earth theory?”). Problem: For recreational gliding the CAO only needs the privilege ARC. According to CA).A.095 (c) (1) and “GM1 CAO.A.095 Privileges of the organization” this is not possible. Solution: EASA to prepare an AMC, GM, Altmc that for gliders following ML is it is also possible to just obtain CAO privilege “Airworthiness review only” (uncontrolled environment as with former MG, with annual physical inspection by AR staff). An even more daring step from EASA and DG Move would be to remove the “ARC- document” all together. If the annual maintenance according to a valid AMP has been performed and on board documents are actual and complete, the aircraft is airworthy and safe (an ARC and AR review does not improve safety or airworthiness).Consequences of PART ML. In the case of non-commercial operations with (powered) gliders (non-complex):1. The owner may approve the AMP according to ML.A.302 (this was already implemented in M.A. 302)2. The owner may decide to perform continuing airworthiness management (which is almost always the case with gliders, where the owner maintains the files with aircraft administration and hands these over to the new owner in the case of a sale). (this was already implemented in M.A. 302)3. The owner does NOT need to engage into a contract for continued airworthiness management with a CAO, 145, CAMO (this was already implemented in M.A.)4. The owner may have maintenance and inspections performed by independent certifying staff (this was already implemented in M.A. 801)5. The airworthiness review may be performed by independent certifying staff who have been accredited by the competent authority (this option was also available in Part M). Under the condition:(a) One or more ARC issues per year(b) Valid Part 66 L license(c) Renewal every 5 years (why, this is unnecessary bureaucratic hassle at high cost)(d) ARC+AR+ Annual must be performed by one and the same AML+ ARS (why, it is often better if people can work together).6. AMP needs to comply with ML.A.302. Which means that completely effective AMP’s according to M.A.302 at a certain point have to be converted to ML.A.302 requirements (waste of resources and time).7. ML is clearer in certain areas but also more restrictive (for instance definitions of ICA and how to follow ICA). ML.A.302 restricts for instance maintenance by owners with respect to the previous version in M.A.302. All publications by manufacturers are now seen as mandatory ICA in ML. In M one could at least check if “ICA” was only a “legal cover my ass action” form a manufacturer and decide to not follow up. ML is less proportional (Roadmap GA?).What seems to have been overseen in PART ML (at least the rationale is not obvious):1. Point 5 (c): why a separate renewal of the privilege to issue ARC every 5 years? Per Part</p>	<p>be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>66 L an AML already needs to have his AML re-issued every 5 years (although also this renewal is questionable bureaucracy not increasing safety). Consideration: The safety of a glider is determined by proper use and maintenance including periodic inspections. The annual issue of an ARC (FORM 15 c) is only paperwork. This paperwork requires hardly any special skills or competences. The person performing the AR and issuing the ARC-form only needs to be aware of the requirements of ML.A.903, perform paper checks and fill out a Form accordingly. Problem: renewal of the AR+ARC privilege is costly and time consuming and totally superfluous. It is not safety driven, but just by the desire of competent authorities driven by fear and desire to limit the citizens they should serve. Solution: EASA to write additional GM and or AMC (Altmoc) explaining renewal every 5 years is not necessary as long as the person with AML holding AR+ARC privilege meets currency requirements for their AML license and have performed at least one AR and ARC issue per year.2. Point 5: why do experienced AML holders, who have been active in MG CAMO's issuing ARC's and performing Airworthiness Reviews have to undergo an new test and approval procedure by the competent authority (which is time consuming, costly and subject to arbitrary interpretation and whims of competent authorities in applying the law). Problem: obtaining the AR+ARC privilege is costly and time consuming, which is unreasonable and anything but logical for AML holders, who have many years of experience performing these AR+ARC reviews as CAMO staff. Solution: EASA to write additional GM and or AMC (Altmoc) explaining that grandfather rights apply to staff employed by MG-CAMO's previously. That this privilege becomes an automatic endorsement on the Part 66 L1 L2 license to be issued free of any cost if a AML holder wants this privilege. This GM should be in place well before PART MG and CAMO according to MG is terminated in September 2021.</p> <p>3. Point 5: why is one individual AML made responsible for both the complete annual inspection and airworthiness review? In Part M it was preferred (if not an obligation) that the airworthiness review staff issuing the ARC was not involved in the annual maintenance. A side effect of the way the regulation is formulated is that Competent Authorities see a reason in the current text to apply limitations to the ARC privileges for AML-holders. Problem: This causes an unnecessary limitations. It makes more sense that AML-holders are allowed to perform task in team form. As long as the work is properly documented on a work order (who did what and who issued a CRS for what). Solution: EASA to write additional GM and or AMC (Altmoc) explaining that Part 66 L1 L2 are allowed to work in teams performing the annual inspection. Thus people can learn from each other (peer to peer training) and individual strength in competences can be best utilized.</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Example: AML “X” performs the annual inspection on the airframe whilst AML “Y” performs the inspection of the engine and propeller. AML “Z” may have overseen the whole project and issue the ARC after performing the AR. This is common practice in larger aero clubs. Look at this from outside the box: Imagine you have a house built (or a new kitchen installed in your existing house). Most people would involve a contractor. In turn the contractor manages the job and involves specialist for demolition of the old home, excavation the plot, masons, carpenters, painters, etc. The contractor does not need deep technical skills. Compare this with continuing airworthiness: The “contractor” == the independent airworthiness review staff. The “carpenter” repairs the airframe, the “bricklayer” inspects engine and propeller. Yes, there are some odd people who can do everything themselves. However the majority is happy that teamwork is possible turning 1+1=3.</p>	
39	Royal Netherlands Aviation Organisation	<p>page 2586. Quality of the documentThe real problem here is that EASA-RMT develops rules for a.o. the gliding sector, members, clubs and volunteers in those clubs providing instruction, maintaining aircraft etc, WITHOUT INVOLVING us / consulting us.The rules should proportional and not more complex or restrictive than in the pre-EASA era. What ever the regulations prescribe should reflect real life. It must be possible for us to apply the regulation to our activities. The regulations must reflect our common practice. It is wrong if EASA comes up with rules that are not compatible with the way we operate as glider clubs. It shows a kind of arrogance that incorrect or unreasonable or unpractical regulations are just forced upon the sector. CA are more or less blind in their beliefs that laws and regulations are always correct. The CA enforce everything on the sector, civilians. It would be nice if CA employees would also question and challenge the laws and regulations for fairness, effectiveness. It would be proper for CA to support the sector and civilians to get faults removed from the law.Since the introduction of EASA rules for gliders and powered gliders our world has been unstable. Rules change continuously. There is no reason for it. Further we see frequently that rules are incomplete, not tested, not first time right. All the fuzz and rework is enormously frustrating, time consuming and a source for more errors and rework. Part CAO is not tested, unreasonable amount of work. In the end we can still only issue the same form 15. Stupid. Part 66 L1 L2 does work for glider maintenance. It is not conceived with the competences in mind to perform annual inspections, on gliders. We get long list of irrelevant knowledge items. The study material is missing, a public question base is missing. This is wrong (take an example of US FAA). For Part 66 L1L2 it is not important to know everything that is not a very useful competence. It is important that an AML knows how to get the information</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’;</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>and knowledge to perform a task. In ML we see that the ARC privilege for AML is implemented in a peculiar, strange and insufficient way. Indeed, we are not satisfied with the rulemaking process. It is not first-time right. It is not based on facts (what causes safety risks, what do we want to minimize, at which cost?). The holistic approach misses. If you want to regulate (powered) glider flying, you should look at the whole picture. It is not fair and not logical to make it impossible for AML candidates to achieve a license, when it is a fact that only 1% of occurrences are due to poor maintenance. Focus on the other 99%. Annex: Reading tips to improve organization, process, speed, reduce cost, improve customer satisfaction. The figure below shows basic management tools which are well proven in the industry. Of tools mentioned below, you find English literature or a starting point on the web. Applying some or all of these tools to EASA, DG-Move, EC, Competent authorities could really help to:</p> <ul style="list-style-type: none"> <li>· Lower cost</li> <li>· Increase speed</li> <li>· Achieve first-time right</li> <li>· Develop regulations that work in the field for pilots, AML holders and clubs, CA.</li> </ul> <p>KAIZEN: Continuous improvement. Important tool is the Deming Circle: Plan, Do, Check, Act. LEAN: Focus on customer value, Remove waste. Part CAO is a good example of only waste without value. AGILE: Swift response to changing conditions. For instance: the currency requirement of 100 working days in two years is clearly a mistake. How to correct this swiftly. Six Sigma: Eliminate differences in the process and the results. Area where Six Sigma would help is with the implementation of Part 66 L exams and theory. Every country is implementing this differently. Which means we are seeing different solutions in all 27 countries. DMAIC is an important tool: Define, Measure, Analyze, Implement, and Control. The Part 66 NPA is a good example of work that is not in compliance with DMAIC. Theory of constraints: Famous story about removing bottleneck's in the process. Bottlenecks limit throughput. Source of the illustration: Linked in, Lecturer Jan Jansen, HAN University of Applied Science, NL.</p>	<p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
40	Royal Netherlands Aviation Organisation	<p>To: European politicians, rule-makers, at EASA, EU, national authorities Subject: Legal situation around continuing airworthiness for (powered) gliders per 2021 (PART ML, PART 66, PART CAO) and flaws established in the field among glider clubs and associations. Required actions to make regulations proportional and fit for purpose will be described below. Who are we? We are some 3500 recreational</p>	<p>Noted. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>glider pilots, members of some 35 aero clubs, associated within the Royal Dutch Aero club (www.KNVVL.nl). Volunteers run a common DTO. Some clubs have their own DTO. Other volunteers operate a PART MG CAMO (since the introduction of EASA / European regulations for continuing airworthiness). All volunteers work part time, mainly in weekends or evenings. Beside their hobby most members have a busy family life and jobs. Some 150 members hold a Part 66 L1, L2 license limited to maintenance and CRS for (powered) gliders as a result of the conversion of national licenses. Some 70 AML holders are members of the CAMO and perform airworthiness reviews and issue ARC's (EASA FORM 15). To keep gliding a viable hobby with enthusiastic participants we need new members. The new members should be given an opportunity to develop themselves as instructors, maintenance staff and all other functions needed. To guarantee our future it must be possible for new member to get licenses as Part 66 L1, L2 etc. However the way regulations are developing and unfolding, they become unreasonable and are out of reach for volunteers. The way Part 66, ML and CAO develop, is killing our activities in the longer run. Unfortunately we see no rationale, reasons or facts why European regulations are so complicated, so limiting. Glider flying was governed by national regulations (or even deregulated). These national systems were established over many years, they were stable, worked. Authorities, involved pilots, engineers and clubs knew how the system worked. There was really no fact based case to introduce an EASA system governing (powered) glider flying. It was just a political whim. As a result we have now lived in a decade of more complex rules than ever before (EASA regulations are a mere explosion of documents when compared to National regulations and almost unintelligible for the average person). Every single paragraph that is changed in Köln causes work in all 27 countries and has effect on all people involved in aviation. The continued stream of changes does not make aviation safer. What misses in our view, is a "First time right philosophy". Also the philosophy of LEAN could be of help (avoid added cost, focus on added value or safety, work fact based). The ever continuing stream of (changes to) regulations and rules means probably that these rules and regulation have not been properly tuned with the sector and have not been tested (can the new rule or change be implemented? what is the effort in time and cost? what are the goals / desired effects? How can we measure results? First test, learn, adjust, then implement if it has proven to work and be effective. The introduction of Part CAO is an example of a disaster, Part 66 L1,2 likewise, this NPA with all the proposed changes to L1L2 will also be a disaster). Do not treat gliding activities in a similar way as other aviation activities (already balloon flying is quite different). And talk with us to</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>discuss the need for regulations that do work and test new regulations and changes before you put them into effect. For instance Volkswagen or Toyota do not put a prototype or concept car in production. Prior, they do severe testing. Legislation should also be tested prior to putting it into effect. It seems that unworkable rules are just pushed down to competent authorities and to pilots, clubs and engineers. In case the glider pilot sectors and engineers indicate that rules are not good or cannot be implemented, there is no open mind to listen to us. The competent authorities represent the viewpoint "it is law so you have to follow the law". What seems to miss here among authorities is "self-reflection"; the willingness to at least consider that the model captured and described in the law is wrong and should be changed (immediately and not after 10 years). Compare it with the "Earth is round" concept versus "flat". EU-EASA should develop rules for a "round world" not for a "flat" world. Rules for a "flat world" should not be introduced in the first place. When accidentally a "flat earth rule" slips through, there should be a quick response from CA, the agency en EC to correct failures. Hopefully it becomes clear that after 10 years of instability we are a bit tired of trying to follow and are also a bit fed up with it. Observations, thoughts, considerations To fly (powered) gliders the pilot (and his/her club) have to comply with many rules and regulations (Medical, FCL, Operations, Design / modifications – CS-22 and CS-Stan, Airworthiness, etc.). It must be a difficult task to design rules and regulations that are proportional and fit for purpose. In other words, rules that support the community to enjoy the sport and keep it safe. We have respect for the rule making teams and are grateful for their work and efforts. However... When looking at regulations in place the rule making teams always seem to focus on items from their specific perspective and are not addressing glider flying as whole and are not keeping in mind the specific merits of glider flying. With all respect, the European initiative with one set off rules sounds sympathetic, but thus far has only delivered a form of suffocation that leads to starvation off glider flying and clubs. An example (an out of the box perspective): Consider part medical for glider flying: What are the cost and how many incidents are prevented? Compare: to drive a passenger car with 8 people on board, one does not need a medical. Glider flying could as well do with a personal health deceleration (which is in place in other parts of the world if we are correct). Part Medical regulations are designed only looking at medical issues. Initially derived from commercial air transport and then adjusted to what the rule making team feels appropriate for gliding as well. In a similar way many changes were introduced over the years to all parts of regulations (FCL, ATO, DTO, NCO, SAO, Initial Airworthiness, and Continuing Airworthiness). Sailplane flying in The</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Netherlands was deregulated prior to EASA era. Now that we have EASA and the many pages of paper, it has not become safer, pilot training has not become any better. Think about this..... Was this really the goal?It seems, as far as gliding is concerned, that the holistic approach is missing. What do the regulations try to achieve or regulate? Why are there any regulations in place? What would go wrong without regulations? How did things go in the pre-regulated era, pre EASA era? How much better (definition of better?) are glider operations now that we have many thousands of pages with rules and regulations? EASA has in its name "SAFETY". OK, if it is more safety we want to achieve, we first should have a definition of safety. We should also define a starting point. What is the safety level per today, based on data? What is the goal, why, what cost are acceptable? Rules and regulations should serve the goal and help the glider flying scene (not hinder, or make people ignore rules by ignorance or on purpose).</p> <p>Some thoughts.... There are statistics on glider accidents. When compared to other aerial activities the level of accidents is fairly high. Maybe the participants find it ok (as with formula 1 or extreme climbing or horseback riding), maybe society has a different view. Back to gliding and accidents: out of 100 accidents more than 95 are pilot related (happening during flight), some 5 are manufacturing or design failures (hence AD's). So less than 1 of 100 accidents are related to continuing airworthiness activities! The holistic approach to improve safety would focus on analyzing accidents and tested methods that reduce accidents occurring during operations. TESTED: means tried in the field prior to implementing rules and laws from behind a desk. However the opposite seems to be happening. Examples of strange things, observations peculiar matters: Part S-FCL: glider license is valid for life. Currency requirement: 5 starts per two years per launching method, 5 hours, 15 landings, 2 flights with instructor per 24 months. For TMG: 12 hours / 12 landings in two years, one flight of one hour with instructor. Instructor: last 3 years &gt; 60 launches or 30 hrs., a refresher every three years and an examination every 9 years. Part 66 L: license has to be renewed at high cost every 5 years (why, what is the purpose, how is an AML different from an SPL?) Heavy administrative requirements apply (logbook, work-orders, traceability of parts, tool and materials), 100 day working experience in two years. Compare this with the requirement for an instructor (only 2 ~5 days per year). It is almost impossible to get an L2 license for a volunteer being a member of a gliding club and keep it valid. The 100 days is clearly a requirement for professionals. We brought the issue to the attention of our CA. They simply refused to look at our concerns and objections. CA reply: "It is in the law, so it must be right" ("a flat earth example"). Why the renewal every 5 years? Why</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>the unreasonable experience requirements? A glider is hardly more difficult than a bicycle. Why can e.g. a qualified car mechanic not be accepted as an L1,2 in a simpler way? Why do volunteers who want to obtain an L1/L2 license have to go through an impossible hassle for theoretical modules and on the job training? Modules that are derived from large commercial aviation maintenance instead of the competences required for simple gliders and their simple engines.....</p> <p>Conclusion: S-FCL is fair (after 10 years of changes). But Part 66 L1/L2 are not tuned to the real world and are not realistic in relation to the safety risk. There is no balance between regulations (e.g. for SPL) and requirements for Part 66 L1 and L2, no risk based approach. A glider pilot needs 15 landings, an instructor, 60 landings/30 hours (compares to 6 days in total in last 3 years) and an AML PART 66-100 days in two years. REMARK every instructor, who would be required to serve 50 days per year, would have to be active every week! Most instructors would discontinue their instruction role immediately Other example: S-FCL-examination is with multiple choice and 4 options per question. To prepare themselves candidates can study questions in the public domain. PART 66 L1, L2: questions have 3 options, have to remain a secret, are not competence based, study material is missing. In 27 countries CA and aero clubs are in limbo and are trying to invent the wheel. EASA should have defined and published study material (free of charge) and a public question data base for L1, L2 (take an example on US FAA). Other example: Many two seater touring (motor) gliders have a limited payload (for instance only 160 kg for two occupants, fuel, maps, and sandwiches). How is it possible that such aircraft meet CS-22? That it is designed, build and produced? How can CA / EASA have issued a TCDS? How can this aircraft be legally sold? Then back to real life: a pilot and his instructor (each 80 kg naked) fly with 50 liters of fuel and sandwiches (+ clothes and shoes by the way). Then the police checks weight and balance. Who gets the fine? Yes the pilot! Who should get the fine: the competent authority or EASA and or the manufacturer for producing inferior products and homologating these for service!</p>	
41	Royal Netherlands Aviation Organisation	<p>AMC 66.A.10 Application, item 1A log book of maintenance experience is desirable and some competent authorities may require such log book to be kept. It is odd that in a level playing field it is accepted that EU member state may implement a different approach. Either we all have the same log book requirement or we don't. This is unacceptable. In General; either we have all the same rules, study material, question data base or we better de-regulate glider flying and (powered) glider maintenance. It is not acceptable that EASA, EC, leave so much room for CA's to implement rules all in very different ways. Some CA's are more open to the sectors needs and show some flexibility or help with</p>	<p>Noted. Not within the scope of this RMT. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>ALTMOC's, whilst other CA's show no flexibility or compassion at all or even restrict the their citizens even beyond the intention of EASA regulations.</p>	
42	European Sailplane Manufacturers Association	<p>Consequences of PART 66 L The idea was probably to define a European license that would be recognized and standardized all over Europe. When reviewing the Part 66 L regulations the impression arises that it was derived mainly from the license system for more complex aircraft used in a commercial setting. So rather for use in a commercial MF, 145, CAO with maintenance privileges. The current requirements for Part 66 L1, L2 do not reflect the way in which gliders are used (low hours per year, simple constructions, not commercial) and maintained (by volunteers with simple tools). It seems the required competencies to maintain a glider where not used as a starting point in defining L1 and L2 and examination modules. This resulted in L1, L2 knowledge requirements that are largely unpractical or useless. Further all 27 EU countries and aero clubs are in limbo and trying to invent the wheel as to what study material to use and developing a question data base. In example: a competent authority has defined a question for module 12 L (avionics) asking how many channels an 8,33, kHz radio set has. Well the CA, defining such a question has clearly no idea about useful competences and useful skills and knowledge to repair, maintain and inspect a glider. It strikes us as odd that the rule making team for Part 66 does not include any representative from the gliding scene who is actually involved in maintenance of (powered) gliders. How can a rule making team that consist out of members of competent authorities and representatives of large industries producing commercial aircraft design suitable and proportional rules for gliding? EASA, Politicians, Rule makers: talk to us and with us. Involve us! First of all ask yourselves: why do we need rules? Then design rules with the people affected by the rules to make sure they are appropriate, logical and can work in a glider club (not somewhere behind a desk in Köln, Brussels, Amsterdam, The Hague, Braunschweig, etc.). Below we will comment Part 66 as described in the EASA easy access rules 1321/2014 and NPA. We will only discuss matters that are of importance to the glider scene. We would like to discuss the choice for L1 and L2 licenses. In the case of a commercial repair workshop according 145, MF, CAO with maintenance privilege it is sensible to combine gliders and ELA-1 (CS-25) aircraft in one license (L2). However in glider clubs in the Netherlands (but also in surrounding countries) we see that, a club is pure gliding (including sustainer, self-launching and touring motor-gliders). ELA-1 aircraft are normally different clubs or at least a different group of members in a club. Glider operations and maintenance are a team effort of members (volunteers). Operations for ELA-1 but also balloons etc is completely different. ELA-1 aircraft are quite often</p>	<p>Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>operated in commercial schools (rentals), privately owned. Also when you have a pure ELA-1(CS-25) club, the maintenance activities are more subcontracted, than a club activity. Club life, and team work are very different in a glider club than in an Ela-1 club. What should we realize? · Gliders clubs are pure volunteer driven based on team work, including motorized gliders. Glider clubs own / operate a larger number of club gliders (5-10) plus privately owned gliders. Motorized clubs and schools are more individual. Maintenance and airworthiness management is more sub-contracted. Private owners of ELA-1 aircraft are more individuals, on average wealthier and it is therefore more common to subcontract maintenance and airworthiness management · Clubs operating both (powered) gliders and ELA-1 are less common. And even if they exist, one finds two different groups of pilots and engineers. In mixed clubs the number of gliders is around 5 -10, versus maybe 1 -3 ELA-1 (CS-25). · Look at the glider fleet. Most modern gliders are FRP (composite). Hence the L1-c license is an option. But there are also a lot of enthusiasts preserving and flying older constructions of wood, covered with cotton and metal tube fuselages. These fellows need a complete L1 license. Problem: how to get a basic level of knowledge for Metal? A similar situation may apply to countries where they fly a lot of metal sailplanes. How should potential engineers get on the job training for wood or composites? Further there are powered gliders. To maintain those and issue a CRS an L2 license is needed. An L1 may not even work on or issue a CRS for the airframe of a powered glider. There are three issues: · Where should an L1 glider technician get his on the job training for extension to L2? · Correct to get an L2, you need to provide evidence of on the job training on ELA-1 (CS25). However there are no options to get experience on CS-25 in the weekends. An L1 glider technician may not work on or issue CRS for work on the airframe of a powered glider. This limitation must be removed. An L1 engineer can very well also repair the airframe of a motorized glider or even an ELA-1 aircraft (wood is wood, fiber is fiber, the craftsmanship and procedures are equal). Other example: an L1C can also replace an altimeter on a wooden or metal aircraft or even ELA-1. Also this unnecessary limitation should be lifted. Other example: an L1C can also replace an altimeter on a wooden or metal aircraft or even ELA-1. Also this unnecessary limitation should be lifted. In the Netherlands most glider technicians hold an airframe/avionics license. We are used that work on engines and propellers is performed by a technician with engine rating. In many cases these engineers with an engine rating have limitations for airframes. We are used to work together. Specialists are complementary. Implement this in Part 66 L1, L2;</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		AMI holders must able to work together in performing and releasing e.g. the annual inspections, airworthiness review, and issuing an ARC (change ML.A.901).	
43	Norsk Helikopter Ansattes Forbund	Page 6, 2.4 B You must include standardization of OJT between the authorities. Otherwise, there can be a lot of different practices. 2.4 C Very Good, gives more freedom. 2.4 D Okay with updating in relation to current technology. Are there transitional rules for those who fall between in relation to "examination credits"? 2.4 E Great way to meet new technology. Okay with the way you can add new skills. maby look at opportunities to put Group E under existing groups.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
44	Norsk Helikopter Ansattes Forbund	"The OJT requirement has always been a complicated issue. It is considered the last opportunity for the authorities to check the competencies of the candidate that are necessary to work in real operational scenarios, evaluated on the first aircraft type to be endorsed in the candidate's licence." Here OJT must be retained. Good arrangement for checking competence at the first certificate in each category.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
45	Norsk Helikopter Ansattes Forbund	PAGE 11. "Category C, with respect to complex motor-powered aircraft, includes the privileges of category C with respect to other than complex motor-powered aircraft" Do you get a C on everything else as long as you have a C on CMPA? Page 12 "In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority" Good, here there will be more control on "internship candidates".	Noted. Page 11: yes Page 12: noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
46	Norsk Helikopter Ansattes Forbund	Page 13. "The practical assessment is not required for category C licences" There should be a requirement. because candidates can also come via "academic route", and they at least need assessment.----- Page 16 "For a category C applicant that holds an academic degree, the participation in the performance of maintenance tasks on operating aircraft should include: maintenance, maintenance planning, quality assurance, record-keeping, approved spare parts control and engineering development" Good, This tightens the requirement. Page 18 6.6.4.5 Endorsement with aircraft ratings This paragraph is good. Page 22 "In the case where the On-the-Job Training is required and the licensing competent authority is different from the competent authority of the maintenance organisation, which provides the OJT, the licensing authority shall accept the OJT programme already approved to the organisation (through Chapter	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		3.15 of the MOE)"Ok, as long as one can maintain a common standard. Possibly the authorities should compare approved OJT programs with each other on a regular basis	
47	Norsk Helikopter Ansattes Forbund	Page 23 "The competent authority, whenever it approves courses, including multimedia-based training (MBT) courses, which are delivered in a physical and/or virtual environment, shall verify that the aircraft basic training and the aircraft type training comply with Appendix I and Appendix III respectively. The approval procedure shall include the principles and criteria of Appendix IX 'Evaluation method for the multimedia-based training (MBT)'. "must ensure that the quality of MBT equipment and the MBT course itself is high and can reach at least the same standard as a regular course	Accepted.
48	Norsk Helikopter Ansattes Forbund	<p><b>Page 26</b> 12. AERODYNAMICS, STRUCTURES AND SYSTEMS Wrong X on module 12 should be Module 13.</p> <p><b>Page 34</b> 12.16 Formerly Pneumatic / Vacuum (ATA 36). This needs to be listed. Large helicopters have these systems.</p> <p><b>Page 39</b> "3. Basic training methods" MBT should be clarified here. This is not good for basic training, if you open for instruction via video link. But the use of instructional videos can be fine.</p> <p><b>Page 83</b> Very good with a good specification of what this should contain / involve.</p> <p><b>Page 87</b> 1,12 (D) Or Answers</p> <p><b>Page 143</b> "Multimedia-based training (MBT) methods may be used in order to achieve the training objectives either in a physically or in a virtually controlled environment "Here you should specify what you mean. This is far too open. We do not want TRT via video link, but may be able to accept some video instruction. For example, videos of how systems work with filming the cockpit.</p> <p><b>Page 147</b> Assessment required to become OJT mentor? Assessment for assessor?</p> <p><b>Page 151</b> "After 3 years, they can apply for the endorsement of the B2 category provided they pass a differencestype training course (from B1 to B2) and carry out an OJT programme limited to the avionics tasks that are missing in the previous OJT. All common theoretical and practical elements and OJT tasks, already demonstrated as B1, shall be considered fulfilled" Why is a new differential course required? They already have the course? This means that you can not go on courses until you have complete basic. If so, this is fine. Is it 2 years basic experience + 1 year conversion from B1 to B2 ? Otherwise good that you do not have to log double OJT.</p> <p><b>Page 157</b> "The use of MSTDs and MTDs for OJT should not be allowed" This is good!</p>	<p>Noted. Page 26 12.: right</p> <p>Page 34 12.16: Accepted</p> <p>Page 39 "3: text already discussed within RMT.0281</p> <p>Page 83: Noted</p> <p>Page 87 1,12: Accepted.</p> <p>Page 143: Rejected. explained in AMC1 147.A.130(a)</p> <p>Page 147: defined by the AMO and accepted by the CA.</p> <p>Page 151: GM to be better defined.</p> <p>Page 157: Noted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
49	Norsk Helikopter Ansattes Forbund	Page 1586.6 OJT assessment This is good! better described than before.	Noted.
50	Norsk Helikopter Ansattes Forbund	<p>Page 230 "Some tasks can be performed on another aircraft type as long as both the system and the task are similar" Who will judge this? Should the assessor have TRT on both types then? the systems must be exactly the same.</p> <p>Page 247 GM to 147.A.105(f) Personnel requirements Training via video link we should strongly advise against. This is because: 1. Language barriers. 2. Worse interaction between instructor and student. Both verbally and by looking at body language. 3. Difficult to express yourself accurately by explaining with your hands and possibly showing something clearly. 4. Poor grid lines / communication platforms impair apprenticeship opportunities. 5. It is more difficult to check whether the student has understood the topic. 6. Easier to cheat. 7. No possibility to touch physical objects.</p> <p>Page 249 147.A.135 Examinations Is it possible to use Bank ID to verify the student ID.</p> <p>Page 249 "Knowledge examinations may also be conducted by accessing the examination questions via uniform resource locator (URL) addresses, provided the knowledge examination environment is under the control of the maintenance training organisation" How will this be secured?</p>	Noted.
51	Europe Air Sports	<p>EUROPE AIR SPORTS GENERAL COMMENTS TO NPA 2020-12 Europe Air Sports appreciates the opportunity to comment on this NPA and recognises EASA's efforts to develop the maintenance regulatory framework. However, the analysis by us and several of our member organisations, notably in the gliding sector, has uncovered several flaws both in the proposals contained in this NPA and other parts of Regulation 1321/2014, (including AMC and GM). We desire these to be addressed speedily i.e. within this NPA /RMT task. A high level summary list of topics that EAS proposes to be changed in the regulation is as follows. Details are found in our specific comments later in this document. The new requirements for practical assessment for L-licenses (66.A.20(c)) The new basic experience requirement to gain additional maintenance experience in a AMO. The increased number of questions for some modules in the theoretical examination for the L-license, as specified in Appendix VIII The NPA is not addressing some issues that are encountered under the current legislation, in the context of L-licenses: Part-66 recency issue, 66.A.20 (b) Issues related to the theoretical examination It should be possible to select options for the set of modules attempted. It should be possible to tailor the contents of the examination, and the resulting privileges, to the actual needs of various aircraft categories (e.g. ELA1 versus sailplanes) Federations are experiencing major difficulties developing the</p>	<p>Noted.</p> <p>The main scope of the RMT.0255, as defined in ToR RMT.0255, is to solve four well defined issues as identified by the Survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of GA community</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		questions database. We request an evaluation of the requirement in 66.A.40 "continued validity of the AML"5. Several of our member associations have questioned the lack of representation from the GA user (operator) community in the rulemaking group. This has contributed to the emergence of the flaws. EAS proposes that a representative from the GA user community joins the Rulemaking Group involved in RMT.0255.	ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.
52	Europe Air Sports	Page 6: 2.4. (c) "Proposal" Add the requirement for the assessment of practical skills. Add 'Practical Assessment' modules in Appendix I (for B1, B2 and B3) and in Appendix VII (for L), required only for applicants without a regular Part147 basic training. EAS Comment: The new requirements for practical assessment (66.A.20(c)) can be considered as fair, as in the past, in the various national systems, practical assessments were applied in several countries. These assessments were usually conducted by federations, according to rules agreed with the NAA. Usually, a single, full day examination was applied, with some mandatory exercises to be demonstrated. 2.4.(c) "Benefits": The practical skills will be checked also for self-trained students: improvement in the competencies expected and therefore positive safety considerations. EAS Comment: We can agree with this. 2.4.(c) "Benefits": Additional business opportunities for Part-147 organisations. EAS Comment: The benefits/drawbacks table identifies the requirement for an assessment (bullet c), but does not motivate the requirement of having the assessment done by a Part 147 or licensing authority, and does not consider its drawbacks on the GA community. However, this has a major detrimental impact. The new requirement in A.66.30(e) is not motivated in this table. However, in the context of technicians, working on a voluntary basis, the impact of this amendment is detrimental. Creating a monopoly for Part-147 organisations for training and practical assessments serves no valid purpose. 2.4.(c) "Drawbacks": No major drawbacks. Additional burden for applicants without approved training course. EAS Comment: The statement "no major drawback" indicates that the light aviation community has been insufficiently involved in the drafting of this NPA.	Noted. NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
54	Europe Air Sports	Page 8, 2nd question: See our comment to 2.4 (c). The proposed solution would imply a major disqualification of the skills of the traditional sailplane community, where airplanes are maintained and personnel are successfully trained and assessed on a non-commercial basis. We are not aware of a safety case for the proposed change, which would not only raise the cost of maintaining sailplanes significantly but also threatens to further reduce the supply of maintenance personnel for light aircraft.	Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
55	nl.147.7366	In the review of Part-66 (Training and examination standards), I would expect that TOR (66.006 Privileges of B1 and B2 aircraft maintenance licences) from 2006, to be incorporated. If an EASA Part-147 must train the future SS and CS, they should train them on their privileges or competencies. If the basic clarification on what "Certifying Staff" are allowed to certify is not addressed &gt; the Part-66 training program should prepare the CS for what? Competence based training? For info this TOR is from 2006 (only 15 years ago) in the current rulemaking program, it remains a non-issue. The under funding (and low priority) of the departments relating to Continuing Airworthiness within EASA is causing frustration in the industry.	Noted. RMT.0097 'Functions of B1 and B2 support staff and responsibilities' will tackle these issues: → Qualification and procedure for staff carrying out maintenance → Role and responsibility of support staff.
56	nl.147.7366	Relating to the "drawbacks" relating to the update of Appendix I and the definition of how many questions per sub-paragraphs must be asked inside an examination. This has a significant impact on the question database structure and the questions. We have a random examination generator, selecting a specific number of questions per topic. To migrate from our current structure to the new structure (over 7000 questions) is a significant task. I would appreciate if in the implementation period this is taken into account.	Accepted. An adequate transition period is established and specified in the Articles of the Cover Regulation, in order to allow for the implementation of the changes by the competent authorities and the training organisation. Some grandfathering provisions are provided for training and exams passed according to the old requirement.
57	nl.147.7366		No comment to reply.
58	nl.147.7366	The current location of OJT requirements, would be more logical in Part-145, "Competency assessment". The link of the OJT with the AML is unnecessary complicating. Currently the majority of EASA Part-145 regard the "Competency Assessment" a paper issue. The Part-145 should also assess the practical skills (as part of the competency assessment) an if needed restrict the SS or CS.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
59	nl.147.7366	Page 18 The disconnect between the review of Part-66 and Part-147 is confusing. The Module E is now connected to Type Ratings. How will an EASA Part-147 be approved for this module. How will this be visible on the approval certificate?	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility).
60	nl.147.7366	Page 19(b) The definitions of the different levels of knowledge required in this Appendix are the same as those contained in point 2 of Appendix III to Annex III (Part-66). Should this be Appendix I? The level definition for Type Training are not really practical for Basic Modules.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility).
61	nl.147.7366	Page 20 If the endorsement for group E aircraft is based upon examination, why are the practical elements defined in this module? This is taking some of the required competency requirements introduced for Cat L, via a loop back to B1, B2 and B3. Very confusing. Is Module E a new "basic" module or not? The link with Type Ratings, but referring to a Module is unclear.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility).



COMMENT NUMBER	ORGANISATION	Comment	EASA response
62	Europe Air Sports	<p>66.A.25(c), page 13:Text in the NPA: "In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority."EAS Comment: The option for a Part-147 approved training organisation to make the assessment:is impractical, as there is a shortage of such organisations with GA in their scope across Europe. In several countries, no Part 147 organizations exist that are active in the domain of light sports aviation, and most definitely not in the domain of sailplanes or balloons. There is little or no commercial interest for Part 147 organisations to start up such activities, as the costs will never be justified, from an economical / financial point of view. So, EASA can not guarantee that this service will be available in all member states.We want to emphasize that it is not acceptable to us that candidates would have to pass an assessment in a different language as their native spoken language. For the applicants, the cost would rise to a multitude of what existed in the past.Unnecessarily creates a monopoly market power for Part-147 organisationsThe option to have the assessment done or overseen by the competent authority seems impractical, as to our understanding the national aviation authorities in some Member States may lack personnel with technical knowledge and practical experience in the domain of light aircraft, especially sailplanes or balloons, to undertake such assessments.The requirement of having a two-day assessment is overshooting its goal: we are not aware of a safety case necessitating such a momentous change in the regulation. Please also consider that the current regulation regarding L-license came into force just recently. Almost no technicians have been licensed under the new regulation. This means that is not possible to evaluate the effect of the current regulation at this time. As the previous (national) system did not lead to incidents, there is no reason to increase the requirements by such an amount.In general, this article:Disqualifies existing club-based organisations which have produced good service for many years.Enacts a measure that is justified as "correcting a safety issue"; however, we are not aware of any safety issue that would justify such a measure. Is disproportionate and not in line with the general aviation roadmap.Our proposal is to have the assessment taken by the federation, (gliding) club or maintenance organisation, and supervised by the national CAA, where they can have the option to be present at the assessment. In case the phrasing "or by the licensing authority" must be maintained on juridical grounds, an AMC should be published where the option as above is described.Additional remark:We want to point out</p>	<p>Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		the link to 66.A.50(b)(2):Current regulation text: “a limitation can be removed upon: (1), ... (2): “after a satisfactory practical assessment performed by the competent authority. “ This point should be aligned with the requirements in 66.A.25.	
63	nl.147.7366	Page 23 Par 66.B.200The introduction of EASA Form 148 and 149 to be issued by Competent Authorities is undesirable. In the previous years there was an active competition between UK-CAA International and EASA Part-147, in countries like Malaysia.As UK-CAA international didn't have to comply with the requirements of EASA Part-147, when offering EASA Part-66 Module Examinations, this was unfair.For example: UK-CAA international was performing "digital examinations" at various embassy's around the world. As per EASA 66.B.200(f) they should have been doing paper-based examinations, but they were not. With this paragraph you create competition between Competent Authorities and EASA Part-147 approved organisations. That is an unfair competition. Not a level playing field.Competent Authorities should be allowed to conduct examinations, when EASA Part-147 are unable to deliver (due to language, or legacy aircraft, etc.), but should be restricted to stay within their borders (Embassies should not be acceptable as a examination venue).Examinations have become a business model of some authorities, this is not a government task.Also the staff of competent authorities involved in examinations (incl Practical examinations) should comply with the same requirements as EASA Part-147 approved examiners. The current introduction of COR's issued by competent authorities, means that mutual acceptance is ensured. This basically means that EASA will enable competition between CA and P147. I would strongly advise against this.	Not Accepted. The authority shall be, by principle, allowed to conduct examinations and release the CoR.
64	nl.147.7366	Page 26Module 12 is not applicable for B2 and B2L	Accepted. M12 does not apply for B2 and B2L.
65	nl.147.7366	Page 26Par 13.4(c) =&gt; is deleted	Accepted. Corrected.
66	nl.147.7366	Page 31Mis-match between EASA regulation and EMAR regulation =&gt; desirable?Par 7.21 Documentation & communication Maybe rename to 7.22 ?	Not Accepted. No connection between EASA - EMAR. Why rename into 7.22?
67	nl.147.7366	Page 32Module 10.6 =&gt; level is missingModule 11.4.2 + 11.4.3 =&gt; level is missing	Accepted. Corrected.
68	nl.147.7366	Page 33Par 11.8(a) should be level 3 for B1.1 and B1.2To align with Module 12 and 13	Accepted.
69	nl.147.7366	Page 34 Should 12.14 be split into 12.14(a) and 12.14(b) for sensors (same as Module 11)	Accepted.
70	nl.147.7366	Pag 3613.16(g) maybe better to replace with "sensors" and not Air-Ground Sensing.I understand that this regulation now comes from EASA-FS =&gt; but this Continuing Airworthiness and OPS.	Not Accepted. It is the Agency's intention to maintain a common wording and understanding between operational crews and maintenance technicians.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
71	nl.147.7366	Page 44 in Par 3.15 => so calculations are no longer required for AC-Transformers?	Accepted. Calculation removed because of lack of relevance to AML holders.
72	nl.147.7366	Page 48. Module 5.16. The details make more sense in Module 10.10 I would expect "fire-wall", embedded software, separation of networks.	Accepted.
73	nl.147.7366	Page 54 New paragraph 8.4 High-Speed Flight, is this really important for aircraft technicians? I do not see a significant added value for aircraft technicians knowing this. This is nice to know.	Basic knowledge for aerodynamics and existing content moved from M11. Transonic conditions apply also to civilian aircraft.
74	nl.147.7366	Page 61 Module 11.19(b) speedbrakes are also important for B1.2	Accepted. Added questions for B1.2. too.
75	nl.147.7366	Page 62 Module 11.13(b) better to change the wording "air-ground sensors" to sensors. For example that would also cover "up-lock proximity sensors". I understand that for pilots air-ground sensors are important, but for maintenance staff this is just a sensor. Please keep all these pilot stuff out of continuing airworthiness.	Not Accepted. It is the Agency's intention to maintain a common wording and understanding between operational crews and maintenance technicians.
76	nl.147.7366	Page 84 Should a reference to Part-145.A.35(n), responsibilities of Cat A1 CS be better. For example it would include simple & routine tasks.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
77	nl.147.7366	Page 85. If module 7.15 is removed, we should not check the competencies of welding and brazing.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
78	nl.147.7366	Page 87 Essay questions for Module 9 should be applicable	Not accepted. The way to improve the learning objective of the essay is to introduce 7.21, then all aspects are verified in a real maintenance environment.
79	nl.147.7366	Page 91 It's unclear which competencies must be checked: For the purpose of the practical assessment, the competencies to be assessed are the following: But this list is different from page 83-85 I see also difficulty with "performance based rulemaking" versus "listing all items which must be assessed" Have a bit of trust in EASA Part-147's.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
80	nl.147.7366	page 91 The candidate handles reliably IT systems. In which module is the person trained for this? I understand this as AMC/GM but not as a hard-law. Does EASA expect that all EASA Part-147 will buy access to the Airbus and Boeing on-line portals? Better to move this to AMC	Not Accepted.
81	nl.147.7366	Page 114 No questions for 10.10 Cybersecurity?	Accepted. 1 question for cybersecurity now in place.
82	nl.147.7366	Page 114 It is not logical that a Cat B1.2 will get more questions than B1.1 on modules 11.1, 11.2. For a question database structure, this will make it very complicated. This should really be avoided.	Accepted. M11.1 and 2 reorganised. N. questions for B11 now > B12
83	nl.147.7366	Page 118 Module 11.10(a) a Cat B1.2 receives more question than B1.1 for Fuel Systems This is really unnecessary complicated.	Accepted. B11 and B12 have now same number of questions.
84	nl.147.7366	Page 121 + 122 + 123 The question distribution for Module 12 is really off target. For example 12.2 Flight Control System (level 3) => 9 questions 12.7.1 Instrument System (level 1) => 9 questions I presume that for Cat B1.4, the	Accepted. M12 is better reorganised.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		flight control system of a helicopter is more important than the instrument system.	
85	nl.147.7366	Page 127 The number of questions for 12.4(b) is not consistent for B2 and B2LThe difference is too high.	Not accepted. This is the only subject for B2L Surv.
86	nl.147.7366	Page 161Module 18 is not added in the extension of the AML Category.Omission?	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
87	nl.147.7366	Page 248AMC 147.A.115(a)— the students' activities are traceable, documented and recorded; andThis is difficult to combine with the EU GDPR, also combined with the fact that an EASA Part-147 must retain this information "unlimited"	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
88	nl.147.7366	Page 252The statements in the certificate Form 148b, states only examination, so Module 18 can not be assessed by the Competent Authority?	Not Accepted. Module 18 no more introduced in the final text.
89	nl.147.7366	This NPA does not comply with the principles of "Performance Based Regulation".In this NPA it's even specified the number of question which must be asked over specific sensors.It doesn't follow the intent of the strategic direction of EASA.	Noted. The number of questions for submodules is set at AMC level and respond to a specific request from some stakeholders to have a more standardised examination.
90	nl.147.7366	From reading this NPA, it becomes clear that the "pilot world" has a too much impact on the "maintenance world".Simple aspects which are important for pilots are now being introduced for maintenance staff. This is nice to know for maintenance staff and not need to know.Example is buffeting of the aircraft in high speed flight => why does maintenance staff need to know this?Also mistakes like on page 61 => sub-module 11.8(a) fire protection at level 1This mistake was (if I remember correctly) introduced in 2011 => rectified in 2015.And now the same mistake is re-introduced.The people in EASA have changed positions and the understaffing at EASA of Continuing Airworthiness is worrying.Combined with Strategic rulemaking program based upon SMS principles, leads to the fact that maintenance related occurrences are (mainly volume and risk assessment) are lower rated.Also because the principles of SMS are not fully introduced in Part-145 and will not be introduced in Part-147.This leads to structural less focus on Continuing Airworthiness. => which will lead to even less staff being dedicated to Continuing Airworthiness (at EASA).I personally thing we will pay the price for this lack of attention.	Noted.
91	nl.147.7366	The concept with Module E is poorly introduced.With the intent of reducing the complexity, this NPA actually creates a new level of complexity.From this NPA, it's unclear which organisation (and how it should be approved) can actually examine this module (Basic or Type training).Theoretical examination, but the content specifies a "Practical element", which will not be assessed?The concept is not yet ready to be introduced. The disconnect between review Part-66 and review Part-147 is not helping in this process.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of the RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
94	Europe Air Sports	<p>Page 162:Appendix VII — Basic knowledge and practical assessment requirements for category L aircraft maintenance licenceTable in the NPA: (if not visible, please see the attached .png file)EAS Comment:In order to obtain a L-license in one of the above subcategories, the examination must include all modules in the right hand column. This has undesirable effects. As this is linked to Appendix VIII, our needs and proposals are explained in the comment to Appendix VIII, see below. If our proposal is adopted, it will require that the above table is amended.</p>	<p>Noted. NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. But following other discussions within the review group (RG) of RMT.0255 ,the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p>
95	Europe Air Sports	<p>Page 188:Appendix VIII — Basic examination and assessment standard for category L aircraft maintenance licenceEAS Comments:</p> <p>1. Number of questions per module / submoduleFor the majority of the different modules/ submodules, the NPA proposes to increase the number of questions. Comments At this stage, there is no need to increase the number of questions for the theoretical examination, for some modules. We want to point out that The number of questions in the current regulation is at least a factor two above what was generally applied under the previous, national, rules. The national systems have proven to be adequate, even to the point that EASA did not consider it a priority to include them in the regulation initially. We are not aware of incidents that are linked to the theoretical knowledge of technicians operating in the domain of L-licenses. The current regulation came into force just recently. Almost no technicians have been licensed under the new regulation. This means that is not possible to evaluate the effect of the current regulation at this stage. As the previous (national) system did not lead to incidents, we fail to see the reason why the number of questions has to be increased. EAS Proposal: Keep the number of questions at today's level. Please refer to the attached file for an assessment of the amount of questions in the various L modules.</p> <p>2. Modules / submodules to be attempted The lists of mandatory modules in the NPA for each L subcategory include modules and submodules that are partly non-relevant for applicants who wish to obtain the license for only individual aircraft subcategories. It should be possible to take the examination with only a minimum number of such non-relevant subjects - with corresponding limitations in the privileges of the license. For example: Now, if a candidate wants to obtain module 4L only (=wooden and/or metal structure covered with fabric), he needs license L1, which requires to pass the examination for modules 5L (composite structure) and 6L (metal structure) as well. A candidate that applies for L1 needs to pass an examination for the complete module 7L, which covers</p>	<p>Noted. A minimum of 20 questions was sought in order to eliminate the 'luck' element from passing/failing. For modules 1L, 2L, and 12L it is mainly a question of fairness towards the test taker. The low number of questions have made it susceptible to an 'unlucky draw' of questions. This skewed the results towards a lesser percentage than expected. A multiple of 4 had to be adhered to, in order to make a clean 75% pass grade possible.</p> <p>Module 1L (+8 Questions): The inclusion of aerodynamics and aerostatics (balloon and aeroplanes) have created an unlucky draw of questions which were not fully applicable to the licence in question, with one such question already amounting to 8,33%; this bad luck element has been lowered.</p> <p>Module 2L (+12 Questions): Gained the topic 2L.6 The 'Dirty Dozen' and risk mitigation with 5 allocated questions. One question amounted to 12,5%; the impact of a bad luck question was too high.</p> <p>Module 3L (+4 Questions): Has been restructured to better reflect the legal demands for Cat. L holders. Additionally, Part-ML and Part-CAO have been added.</p> <p>Module 4L (+8 Questions): Due to the fact that two types of different construction are tested and in order to treat both fairly, the number of questions had to slightly increase. The alternative would have been to split it in two modules with the same number of question as 5L and 6L.</p> <p>Module 5L and 6L (+0 Questions): Remain as they were in the number of questions.</p> <p>Module 7L (-4 Questions): 4 questions are lost due to the move of topics into Module 8L and 12L.</p> <p>Module 8L (+16 Questions): As electric engines and small turbine engines have gained more prominence in the aircraft covered by L2, the module has been adapted to this and has increased the previously marginal aspect in those topics in Module 8L. The alternative would have been to split it in different engine modules similar to the B1 modules.</p> <p>Module 9L (+0 Questions): remains as it is in the number of questions; the</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>subjects that are irrelevant to him, such as slats, air conditioning, ice &amp; rain protection, servo tabs, lights, pneumatic and vacuum systems, ... A candidate that only wants to work on powered gliders and not ELA1 aeroplanes needs L2. For this he is required to pass an examination for systems such as constant speed propellers, fuel injection systems, FADEC and turbochargers, which are never applied on powered sailplanes. He bullet above is also relevant in this case. A candidate that wants to work on ELA1 aeroplanes and not gliders is forced to pass an examination that includes engine retraction systems, folding propellers and water ballast systems. EAS Proposal: We suggest making entire modules and some submodules optional. This would result in a license with limitations, comparable to what was applied upon the conversion from the national rules. This would be in line with the logic of 66.A.45(h)(ii): in that provision the option is provided to apply limitations in case the OJT requirement for a module was not met. It would make sense that the theoretical examination does not need to be taken either, in such a case. Limitations should be allowed for:</p> <ul style="list-style-type: none"> <li>· Modules 4L, 5L, 6L</li> <li>· Certain groups of aircraft, ie:</li> <li>· ELA1 aeroplanes,</li> <li>· Unpowered sailplanes</li> <li>· Powered sailplanes.</li> </ul> <p>An AMC could be published with a standard set of submodules that have to be taken in order to be granted specific qualifications. The applicant should be able to remove limitations later by passing a theoretical examination for the required modules or submodules only (+ the required relevant OJT and assessment). The benefits are obvious: Applicants can tailor the contents of their examinations to those modules / submodules that they will actually need in their work. This saves time and costs and increases the motivation of students. Please refer to the attached file for a suggestion of relevant modules/submodules for certain aircraft categories.</p> <p>3. Number of questions in case of a partial examination, as proposed above: In case point 2 above is adopted it must be possible to adapt the number of questions according to the number of submodules taken in the examination.</p> <p>4. Issues encountered in certain countries regarding the theoretical examination In some countries, the theoretical examination is not available at this time, for practical reasons: Federations are experiencing major difficulties creating the questions database. Often, they are active in a specific domain, and don't have the expertise required to draft questions related to other domains, but which are required in order to obtain an examination that is meeting the requirements. See also point 2, above. An additional</p>	<p>instrumentation has been moved into this module; 12L no longer required for L3H.</p> <p>Module 10L (+4 Questions): The instrumentation has been moved into this module, gondola type of TGB now included, 12L no longer required for L3G.</p> <p>Module 11L (+4 Questions): The module has been rewritten, more focus on the gondola.</p> <p>Module 12L (+4 Questions): The instrumentation has been completely moved here from Module 7L.</p> <p>Regarding the other points, although they are very good comments, the working group of RMT.0255 could not discuss in deep these issues because they were outside the scope of RMT.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>difficulty in the field of sailplanes is that almost no sailplanes of metallic construction are in use. This limits the expertise of some sailplane federations to the point that they are unable to draft a theoretical examination for module 6L. Since the module is mandatory for the examination for licenses L1 and L2, they are unable to setup an examination that is meeting the legal requirements. It should be possible to provide the option to apply a questions database without the module 6L. Having the examination created by Part 147 organizations is not a valid solution, for the same reasons as mentioned under article 66.A.30(c), above. The competent authorities do not have the required knowledge or resources to edit the database. In some countries this has rendered the training of new certifying staff impossible. The option to pass an examination in another country is not valid, as it is not reasonable that candidates would have to pass an assessment in a different language as their native spoken language. The examination is about testing technical knowledge level, linguistical issues should not be a factor. We call upon EASA to rectify this situation. Adopting point 2 would be a major help, as this way the federations can restrict themselves to their domain of expertise, which would enable them to develop a questions database in agreement with the knowledge that is required by technicians in their domain, yielding AML with privileges for their specific needs.</p>	
96	Europe Air Sports	<p>We do not understand how this NPA is fulfilling the objective “facilitate the type-rating endorsement for aircraft without a Part-147 type training,” This NPA is going in the opposite direction.No impact assessment has been done considering the impacts on club-based maintenance organisations for small aircraft, which are in fact severely affected by the proposed examination and assessment requirements.Who is being aimed at with the statement in the executive summary: “reduce the deficit of the practical skills of maintenance staff”? In any case we are not aware of such deficit in our environment.Furthermore, the Part 66L license came in effect just recently. The training for Part 66L is stricter than what was applicable under the national systems.Almost no technicians have been licensed under the new system, at this time no information has been gained regarding deficits or the need for amending the regulation.EASA should at least gain some experience with practical implementation of the Part 66L license, before deciding that there is a deficit in practical skills, and forcing measures that have a huge impact, both operationally and financially, and that risk to render the access to the license impossible for new technicians, and that goes directly against the philosophy of the general aviation roadmap.We feel that the working group that drafting this NPA is not familiar with our needs and specificities, and that it is crucial that we would be represented in this group.Better regulation</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’;</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>principles not followed: Stakeholder participation of the user community has not taken place until this NPA; no representation of sports aviation and operators of small GA aircraft in preparatory group. Remedies : Rewrite the examination and assessment provisions Include a workable solution for the recency requirements (66.A.20(b)(2)) Drop or rewrite the new requirement in 66.A.30(e) for L license Include GA user community organisation representatives in preparatory group</p>	<p>difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.
97	Europe Air Sports	Comments to Page 1: Executive Summary The list of objectives in the Executive Summary mostly addresses those proposals in the NPA that concern the maintenance licensing for large aircraft. However, the NPA also contains several proposals with a high potential negative impact on the light GA community, where maintenance often takes place within a club environment. A quick read of the executive summary might lead to the impression that light aviation is not affected by the NPA, while it clearly is. According to our member organisations these proposals are enough flawed to threaten to restrict the supply of skilled and motivated maintenance personnel and to increase the cost of maintenance significantly, with no or minimal safety effect. Please see the summary list in the General Comments section, as well as our individual comments. The "Affected Stakeholders" list does not include flying clubs and similar organisations that have for many years performed maintenance and trained their members on a voluntary basis, and which are very much affected by some of the proposed amendments in the NPA. Please amend this. The executive summary lists "proportionality" as one driver, but from the viewpoint of the GA community, several critical changes are not proportional at all, but examples of overregulation for no useful purpose. Contrary to the "no major drawbacks" claim, according to our member organisations the drawbacks would be quite severe, especially in the gliding sector.	Noted. The main scope of the RMT.0255, as defined in ToR RMT.255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft'; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.
98	AEROK Ltd.	Dear Sir or Madame, The planned modifications of the CoR (p253) deletes the possibility of giving out theoretical AND practical certificates. In the modifications both AND and OR are crossed out, from which deleting the OR is a reasonable thing, but deleting the other seems accidental, since the Appendix III to Part 147 Chapter 2 has not changed. Our opinion is that the OR can be deleted, but AND should be kept in the template, so theoretical and practical certificates could be issued. Thank you for noticing. Yours sincerely, György Bicsák	Noted. Possible cases for Form 149 are now: - completely attended and passed the theoretical elements and positively assessed on the practical elements of the type training course; or - completely attended and passed only the theoretical elements; or - positively assessed on the practical elements; or - positively completed the aircraft type evaluation..
99	DGAC-France	66.A.30 (a) 4): If item (i) includes B2L certifying/support staff experience, why it does not also include B3 and L? B3 and L holder can also be certifying/support staff according to 145.A.35.	Accepted.
100	DGAC-France	66.A.30 (e) : This requirement is too restrictive. For example, it excludes experience gained under the supervision of independent certifying staff (which is usually seen in B3 and L applications).	Accepted.
101	DGAC-France	GM 66.A.30 (a): In the first row, of the table, L5 is not mentioned. In the second row completed by L.	Not Accepted. Cat. C cannot be obtained from L5 category.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
102	DGAC-France	66.A.45 (a): IR has to be updated to list Group E as endorsable on the applicable categories.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
103	DGAC-France	66.B.130 (c): Statement indicates EASA Form 149b instead of EASA Form 149c.	Accepted.
104	DGAC-France	Appendix I : According to GM to Section 1, Academic route for category C require to pass modules 11, 12, 15, 16 and 17 when choosing B1 modules : precisions on levels and subjects are missing.	Noted. Point 66.A.30(g) now specifies modules and levels for Cat. C applicable to the B1 and B2 cat.
105	DGAC-France	Appendix IV: erase " obtaining a licence category " in the 1st sentence, in B3 to B1/B2/B2L, module 2 is not necessary (same level), in L5 to B2/B2L, module 6 is not necessary (B1 level > B2 level), in L5 to L1C, module 5L is not necessary (not needed in B1 to L1C) (same matter in L5 to L2C), in B2/B2L to L5, 10L and 11L are missing (according to Appendix VII), in L3H/L3G to L1C/L1/L2C/L2/L4H/L4G, 12L is missing (according to Appendix VII),onsidering the specificity of module 8L : complete requirement for any B1/B3 to L2/L2C/L4H/L4G/L5.	Accepted.
106	DGAC-France	Appendix II to AMC: A2 : B2 FOT on 31-30: grey case instead of white case. C : Five and Three annual inspections at the same time for gas balloons	Accepted.
107	AVIATEC S.A.	Subject: 147.A.105(e) (Instructors/ Knowledge examiners/ Assessors)Comment 1:The absence of qualifications on instructors/ knowledge examiners/ assessors (I/E/A) by the Regulation and delegating the definition of qualifications to the competent authorities, makes a board range of acceptance criteria for the I/E/A personnel across the community. While some NAAs accept I/E/A with 5+ years of experience as Category C or 9 years as B1/B2, others require less strict criteria.Also some NAAs accept I/E/A that do not hold an EASA Part-66 license- may hold other ICAO license- but some others do not accept them.The Regulation shall standardize the acceptance criteria (qualifications) and those criteria have to be effective to all EASA Member States NAAs. Lack of standardization guides to: Variation in the level-quality of provided training (due to Instructors with low qualifications)Unfair competition between MTOs;Difficulties to find qualified I/E/A to deliver trainings and conduct examinationsComment 2: There is a lack of instructions for the roles of «instructor», «examiner» and «assessor» and the combinations thereof. Possibly a new AMC could be introduced. An instructor that is also approved/authorized as examiner should not select the questions for the examinations, unless the selection is based on a controlled procedure (i.e. automatically generated from a	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		software based database under the control of the examination manager- random selection).	
108	AVIATEC S.A.	<p>Subject: EASA Form 149a issue 5</p> <p>Comment 1: On the following change: [SPECIFY THE THEORETICAL ELEMENTS AND/OR PRACTICAL ELEMENTS] We propose to keep the “AND” in order to make it clear that the same certificate can be issued for the theoretical and practical elements. Also we propose the following alteration to the text: This certificate attests confirms that the above-named has either successfully passed(**)/ attended (**) the theoretical (**) and/or the practical elements (**) of the approved aircraft type training course stated below and the related examinations (**) in compliance with Regulation... In order to cover the case of a student attended only the theoretical element of a type rating training course and due to any reason (i.e. COVID-19 restrictions) decided to complete the examinations in another organization. Since the theoretical type training course of any MTO is approved by the local NAA or the EASA, it is clear that it covers the minimum requirements as set out in Appendix III to Part-66. Hence, each student, subject to performance of the theoretical type rating course should be competent and able to attend examinations on the respective type rating irrespective of the where he/she has attended the theoretical part. We understand that questions arise regarding the effective training hours and levels taught in each chapter between different organizations. In order to avoid possible conflicts or situations where a student will decide to attend examinations in another MTO due to he/she had failed to the examinations in the MTO which delivered the training, each MTO –in order to have the capability to accept a student only for examinations in a type rating- should assess this student, i.e. request a certificate of completion or other document by the MTO which delivered the theoretical training and a syllabus. Then the MTO, which plans to enroll the candidate to its examinations, shall decide if the student needs additional training to some ATA chapters. Also, due to the practical assessment of a student is the last barrier before the candidate endorses the type rating to his/her license and exercises the related privileges; we are opposed to extending the above capability to the practical element of a Type rating. Comment 2 Due to the many references, it is not clearly stated when the “AIRCRAFT TYPE EXAMINATION (**)” can be used. Based on the «questions related to the CoR Form 149 Issue 1», uploaded in the EASA website (not easily accessed, can be found only with a search engine but not thru the EASA website), this is only the case of aircraft type examinations for aircraft types that do not require a type training, but from the Regulation it is not strictly defined that this is the case.</p>	<p>Noted. Possible cases for Form 149 are now:</p> <ul style="list-style-type: none"> <li>- completely attended and passed the theoretical elements and positively assessed on the practical elements of the type training course; or</li> <li>- completely attended and passed only the theoretical elements; or</li> <li>- positively assessed on the practical elements; or</li> <li>- positively completed the aircraft type evaluation.</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		MTOs should be clearly allowed to arrange approved Type examinations-only, (if needed by customer) and issue a relevant CoR.	
109	AVIATEC S.A.	<p>Subject: 66.A.30(d)For the purposes of this comment we use the term CMPA for B1.1 or B1.3 and General Aviation (GE) for B1.2 or B1.4.</p> <p>In the scope of the revision for the Category C experience, we propose to make it clear that for the initial application for an aircraft category (B1.1, B1.2, etc.), that the experience can be combined. i.e. an applicant can apply for B1.1 and B1.2 by presenting experience that was gained at the same time. For your reference we present you the following examples:An applicant that works in a Part-145 organization that maintains CMPA and general aviation aircrafts and is engaged in the maintenance of both aircraft categories in the same period.An applicant who is employed in an organization that maintains CMPA and in the same time he/she gains experience in general aviation aircrafts outside the scope of that organization. Some NAAs not accepting that kind of experience and requesting further experience (at different time periods) guides to unfair treatment between applicants across Member States and making it difficult to the candidate mechanics to evolve. Considering the limited GA community of Europe if an experience in GA's aircrafts is withdrawn by a NAA, then it is nearly impossible to find a new practical experience, even though for 6 months, since most aircrafts fly only a few hours per year. This situation will potentially lead to lack of experienced mechanics in GA since they will possibly choose to submit their experience in CMPA and not in GA.</p>	Noted.
110	AVIATEC S.A.	<p>Subject: Appendix II to Part-66 (paragraph 1) and 147.A.135 We propose Part-66 Basic course Module examinations to be performed MANDATORY by the use of an electronic (computerized) procedure, approved by the NAA supervising the MTO. Hard copy exams no longer to be allowed. The use of electronic software (QB generator) has a very low cost impact (less than 5,000 euros) for the MTOs to implement and will ensure the integrity of the examinations at the highest possible level.</p>	Noted.
111	AVIATEC S.A.	<p>Subject: 147.A.145(b)Although the following paragraph (c) remains unchanged, the absence of instructions regarding the controlled procedures may lead the NAAs of different Member States to handle differently the procedures applied by the organizations.Practical training and assessments for type ratings cannot always be performed at locations specified in the approval certificate and in the locations specified in the MTOE, and are subject to aircraft availability. Since the Operators/Maintenance Organizations giving priority to their main activities (which is not training), most of the time the aircraft access is arranged in a short time period before the performance of the practical.If the MTO does not have</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		such locations prepared and approved, the practical element (training and assessment) can be performed in the real maintenance environment of an approved maintenance organization (either EASA or foreign) subject to a contract with the MTO under the supervision of practical instructor(s) and assessor(s), this should be enough. The most difficult is to find access to the aircraft, most of the time it is arranged a few days before the performance of the practical part of the course. If an approval from local NAA is needed for this, then the time needed to get this approval (bureaucracy procedures and fees) will make the performance of the practical not feasible. Also, the MTOs that belong to Operators/Maintenance providers, will be favored/having benefited from such a procedure (since they own aircraft(s)) in comparison to smaller MTOs that rent the access to needed aircrafts. This case is against promotion of fair business within EU and will have as a result the creation of monopolies within EU, which is strictly forbidden by EU laws and mentality. The small size MTOs will face difficulties in doing business and possibly their employees will lose their jobs.	
113	KLM	Page 248 AMC 147.A.130(a) training procedures and quality system Addition to table 3 (Page 794 of 1107   Feb 2021) Include 6 (MSTD) in Distance Learning Synchronous Add a note stating the requirement that the use of a MSTD in a DLS training should include a means of logging the student activity.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
114	KLM	Page 249 147.A.145 Theoretical training, knowledge examinations, practical training and practical assessments may be carried out only at the locations identified in the approval certificate and/or at any location specified in the maintenance training organisation exposition (MTOE). This is neither practical nor feasible for Line Stations. Either all stations (with PT/PA) would have to be approved and mentioned in the MTOE (huge administrative burden for a large company) or staff would have to travel to an approved station which would be a financial burden. - Comment & remove practical training and practical assessments from this amendment limiting it to theoretical training and knowledge examinations.	Noted.
115	KLM	Appendix III (OJT) Page 147 The requirements for a mentor are set too high and the differences versus an assessor are too little. They have experience in training other people (such as being apprenticeship trainers, Part-147 trainers, have delivered train-the-trainer courses, or have any other comparable national qualification)- Change requirements for example: They are able to coach colleagues within the scope of their job description. Assessor They have experience and/or have received training in examining others (such as being apprenticeship trainers, Part-147 examiners, have delivered train-the-trainer courses, or have any other	Noted. The requirements for mentor and assessor area adequate to the scope.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		comparable national qualification). Change examining to assessing ( taking an examination is the privilege of an examiner)	
116	KLM	Page 148NPA suggests to have all OJT tasks assessed. Comment: This is a too greater burden. Do an assessment on a limited number of selected tasks. Once the basic understanding is confirmed then there is no need to assess all tasks.	Noted. This is not true. The text does not suggest assessing all the tasks.
117	KLM	General Changes to the Basic Training could impact the TMC (Type Mechanic Course) choice module for students doing a technical education in aircraft maintenance (i.e. ROC Hoofddorp/Amsterdam) and with that this could influence the standard for hiring new staff, for example ROC students (= long term issue) How do we address the differences in standard of training between present workforce versus students who leave school following the latest curriculum? - - Grandfather rights for present workforce.	Accepted. An adequate transition period is established and specified in the Articles of the Cover Regulation, in order to allow for the implementation of the changes by the competent authorities and the training organisation. Some grandfathering provisions are provided for training and exams passed according to the old requirement.
118	osk Hyvä Tapa Harrastaa	In principle, the practical skill assessment idea is good. But the only arrangement possible outlined in NPA will kill sport aviation. The skill test requirement is set, which will increase cost of the license hugely. Applicant must either attend a training course arranged part-147 approved organization. The training course (for 66L) is not defined, what is consist, this is a real money maker for p147 organisation. Assuming that any p147 is interested of part-66L license, as there is no money in that business. Or attend a 3 (three) days assessment that can only be arranged by p147 approved organisation. The other money maker for p147 organisation. NPA includes a possibility for this assessment to be held by other organisation (in 66.A.25 (a)(iii)) but this possibility is negated in all other points in rules (which must be obeyed). Generally, this NPA bends light aviation needs to same form as larger CAT organization needs. Part-147 outfits will not have motivation, nor will they be interested in fulfilling this role for GA as there is NO MONEY IN IT. All that will happen is that light GA aviation (certainly gliding and ballooning) will die a slow strangulation as competent people retire. If this NPA ideas goes forward unaltered, a huge increase in cost is to be expected. And availability of 66L licensed persons will vanish. There is more than adequate expertise in the movement to safely execute this function internally. Experience has shown that the old way of arranging competent persons to take care of this light aviation needs is a safe route. This is the least risk route! Light GA can not be assumed to be a "mini-CAT" world as this NPA addresses it. This measure as scoped will definitely NOT work for light GA. PDF page 5 top(c) require that self-trained applicants for the basic AML demonstrate an appropriate level of practical skills; Nice idea, only that it is not made possible. NPA is geared to allow only part-147 to arrange these PDF page 6 point (c) Add the requirement for	Noted. NPA 2020-12 introduces a new requirement —practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>the assessment of practical skills. Add 'Practical Assessment' modules in Appendix I (for B1, B2 and B3) and in Appendix VII (for L), required only for applicants without a regular Part147 basic training. The practical skills will be checked also for self-trained students: improvement in the competencies expected and therefore positive safety considerations. Additional business opportunities for Part-147 organisations. No major drawbacks. Additional burden for applicants without approved training course. In reality this means: Huge increase in cost. This lowers the safety of continued airworthiness for all light aviation, as availability of new 66L licenses decreases or vanishes. EASA should think also safety, not only greedy business. PDF page 11 Added to 66.A.25 Basic competency requirements (a) The applicant shall demonstrate by examination a level of knowledge that is appropriate to the related subject modules in accordance with Appendix I (applicable to B1, B2 and B3 licences) or Appendix VII (applicable to L licences) to Annex III (Part-66). The examination shall comply with the standard set out in Appendix II (applicable to B1, B2 and B3 licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by: (i) a training organisation that is appropriately approved in accordance with Annex IV (Part147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory. Point (a)(i) - (iii) introduces three ways to conduct skill test; 1) part-147 training organization, 2) competent authority (later NAA) and 3) other organization as agreed by NAA. Only that the later points rules NAA and other organisations out of the possibilities. And later 66.A.25 (c) In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority. So in effect, 66L license is only intended to be a part of part-147 organizations offering. What is said in 66.A.25 (a) (iii) is not possible as point (c) reserves this practical assessment only to part-147 or authority. Later we show that it is not possible even for NAA. (PDF page 14) Also AMC 66.A.25 has the same message. Only part-147 or authority can perform that practical assessment, as EASA form 148 is possible for them only. PDF page 164 bottom. Appendix VII, below table of content: Module 13L is required only for applicants that do not attend a Part-147 basic training course. Appendix VII contains requirements for knowledge and practical skills for part-66L applicants. So this gives two possibility: a) attend a course arranged by p147</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>(when practical assessment is not required) or b) by attending practical assessment held by p147! Appendix VII, module 13L. The candidate shall demonstrate the required competencies while performing a number of maintenance tasks selected by the training organisation or by the competent authority. PDF 188 Appendix VIII (c) Module 13- Practical assessment The practical assessment shall include an introductory phase where the training organisation, which conducts the assessment, instructs the candidate on the facilities, access to the documents, materials, and tooling. This means in practice a day or so more time needed for the practical assessment. PDF page 208 AMC to Appendix VIII MODULE 13L — PRACTICAL ASSESSMENT Practical assessment duration is 2 (two) days plus a training session (Appendix VIII (c) Module 13- Practical assessment, PDF 188 bottom). So it is 3 (days). And as practical assessment is reserved to NAA or p147 this means that they are held during working days. Part-66L license is mostly required for non professional flying. Today almost all maintenance is done by non full time mechanics, with good safety record. This arrangement most likely will repel all those who are not looking for full time job. And those who are looking for full time job as mechanics, do not want only 66L lisenice! And what should be included in the practical assessment. That PDF p208 instructs that tasks are selected from table in AMC to appendix VII. So go back to page PDF pages 167 , 185, 186, 187. Page 185. Let us assume that practical assessment is done properly. Then it must be made with tools and aircrafts that are relevant to license. Needing gliders (at least three to cover all material groups), etc. A motorglider, a LSA/ELA1 class aeroplane (tree for material groups), balloon. Normal part147 organization is geared to teach mechanics for heavy aircraft (CS-25 or CS-27/29) in CAT environment. So the majority of samples they have are not relevant for 66L license holder. è They must acquire these samples for this 2 day test. Which they really cannot use for the rest of year. If no part-147 organisation is interested (this is almost 100% sure), then the task of taking this practical assessment is forwarded to authority only. Authority is the second alternative to hold these practical assessments! That third alternative in 66.A.25 (a)(iii) is negated in all other rule points! So they must hire civil servants that are competent on these subjects, and stay current. They must arrange workshop and they must arrange samples for the test. Plus perform that needed training session (PDF 188 bottom). Probably once a year or two or three. A highly unlike scenario. Summing up: this NPA will kill general aviation, by making impossible to get part-66L license.If skill test's would be introduced, a new approach must be considered. An another</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>organization as agreed by authority as said in 66.A.25 (a) (iii) must be given those possibilities as now is granted only to part-147 organisation, This another organization, exemplified by airports organisations in most European countries, must be allowed to; - - Basic training on light aviation maintenance shall be allowed and accepted for these non-147 organisations, - - - They shall be allowed to accept skill tests and certify it in form accepted by authority (i.e. alternative to EASA Form 148), - - A more practical way of integrating training and skill tests must be allowed. To facilitate weekend training courses to be possible. NPA's stiff tree day session is not practical for step by step training.</p>	
118	osk Hyvä Tapa Harrastaa	<p>In principle, the practical skill assessment idea is good. But the only arrangement possible outlined in NPA will kill sport aviation. The skill test requirement is set, which will increase cost of the license hugely. Applicant must either attend a training course arranged part-147 approved organization. The training course (for 66L) is not defined, what is consist, this is a real money maker for p147 organisation. Assuming that any p147 is interested of part-66L license, as there is no money in that business. Or attend a 3 (three) days assessment that can only be arranged by p147 approved organisation. The other money maker for p147 organisation. NPA includes a possibility for this assessment to be held by other organisation (in 66.A.25 (a)(iii)) but this possibility is negated in all other points in rules (which must be obeyed). Generally, this NPA bends light aviation needs to same form as larger CAT organization needs. Part-147 outfits will not have motivation, nor will they be interested in fulfilling this role for GA as there is NO MONEY IN IT. All that will happen is that light GA aviation (certainly gliding and ballooning) will die a slow strangulation as competent people retire. If this NPA ideas goes forward unaltered, a huge increase in cost is to be expected. And availability of 66L licensed persons will vanish. There is more than adequate expertise in the movement to safely execute this function internally. Experience has shown that the old way of arranging competent persons to take care of this light aviation needs is a safe route. This is the least risk route! Light GA can not be assumed to be a "mini-CAT" world as this NPA addresses it. This measure as scoped will definitely NOT work for light GA. PDF page 5 top(c) require that self-trained applicants for the basic AML demonstrate an appropriate level of practical skills; Nice idea, only that it is not made possible. NPA is geared to allow only part-147 to arrange these PDF page 6 point (c) Add the requirement for the assessment of practical skills. Add 'Practical Assessment' modules in Appendix I (for B1, B2 and B3) and in Appendix VII (for L), required only for applicants without a regular Part147 basic training. The practical skills will be checked also for self-trained students: improvement in the competencies</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>expected and therefore positive safety considerations. Additional business opportunities for Part-147 organisations. No major drawbacks. Additional burden for applicants without approved training course. In reality this means: Huge increase in cost. This lowers the safety of continued airworthiness for all light aviation, as availability of new 66L licenses decreases or vanishes. EASA should think also safety, not only greedy business. PDF page 11 Added to 66.A.25 Basic competency requirements (a) The applicant shall demonstrate by examination a level of knowledge that is appropriate to the related subject modules in accordance with Appendix I (applicable to B1, B2 and B3 licences) or Appendix VII (applicable to L licences) to Annex III (Part-66). The examination shall comply with the standard set out in Appendix II (applicable to B1, B2 and B3 licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by: (i) a training organisation that is appropriately approved in accordance with Annex IV (Part147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory. Point (a)(i) - (iii) introduces three ways to conduct skill test; 1) part-147 training organization, 2) competent authority (later NAA) and 3) other organization as agreed by NAA. Only that the later points rules NAA and other organisations out of the possibilities. And later 66.A.25 (c) In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority. So in effect, 66L license is only intended to be a part of part-147 organizations offering. What is said in 66.A.25 (a) (iii) is not possible as point (c) reserves this practical assessment only to part-147 or authority. Later we show that it is not possible even for NAA. (PDF page 14) Also AMC 66.A.25 has the same message. Only part-147 or authority can perform that practical assessment, as EASA form 148 is possible for them only. PDF page 164 bottom. Appendix VII, below table of content: Module 13L is required only for applicants that do not attend a Part-147 basic training course. Appendix VII contains requirements for knowledge and practical skills for part-66L applicants. So this gives two possibility: a) attend a course arranged by p147 (when practical assessment is not required) or b) by attending practical assessment held by p147! Appendix VII, module 13L. The candidate shall demonstrate the required competencies while performing a number of maintenance tasks selected by the training organisation or by the competent</p>	<p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>authority. PDF 188 Appendix VIII (c) Module 13- Practical assessment                      The practical assessment shall include an introductory phase where the training organisation, which conducts the assessment, instructs the candidate on the facilities, access to the documents, materials, and tooling. This means in practice a day or so more time needed for the practical assessment. PDF page 208 AMC to Appendix VIII MODULE 13L — PRACTICAL ASSESSMENT                      Practical assessment duration is 2 (two) days plus a training session (Appendix VIII (c) Module 13- Practical assessment, PDF 188 bottom). So it is 3 (days).                      And as practical assessment is reserved to NAA or p147 this means that they are held during working days. Part-66L license is mostly required for non professional flying. Today almost all maintenance is done by non full time mechanics, with good safety record. This arrangement most likely will repel all those who are not looking for full time job. And those who are looking for full time job as mechanics, do not want only 66L licence! And what should be included in the practical assessment. That PDF p208 instructs that tasks are selected from table in AMC to appendix VII. So go back to page PDF pages 167 , 185, 186, 187. Page 185. Let us assume that practical assessment is done properly. Then it must be made with tools and aircrafts that are relevant to license. Needing gliders (at least three to cover all material groups), etc. A motorglider, a LSA/ELA1 class aeroplane (tree for material groups), balloon. Normal part147 organization is geared to teach mechanics for heavy aircraft (CS-25 or CS-27/29) in CAT environment. So the majority of samples they have are not relevant for 66L license holder. They must acquire these samples for this 2 day test. Which they really cannot use for the rest of year. If no part-147 organisation is interested (this is almost 100% sure), then the task of taking this practical assessment is forwarded to authority only. Authority is the second alternative to hold these practical assessments! That third alternative in 66.A.25 (a)(iii) is negated in all other rule points! So they must hire civil servants that are competent on these subjects, and stay current. They must arrange workshop and they must arrange samples for the test. Plus perform that needed training session (PDF 188 bottom). Probably once a year or two or three. A highly unlikely scenario. Summing up: this NPA will kill general aviation, by making impossible to get part-66L license. If skill test's would be introduced, a new approach must be considered. An another organization as agreed by authority as said in 66.A.25 (a) (iii) must be given those possibilities as now is granted only to part-147 organisation, This another organization, exemplified by airports organisations in most European countries, must be allowed to; - - Basic training on light aviation maintenance shall be</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>allowed and accepted for these non-147 organisations,- - They shall be allowed to accept skill tests and certify it in form accepted by authority (i.e. alternative to EASA Form 148),- - A more practical way of integrating training and skill tests must be allowed. To facilitate weekend training courses to be possible. NPA's stiff tree day session is not practical for step by step training.</p>	
118	osk Hyvä Tapa Harrastaa	<p>In principle, the practical skill assessment idea is good. But the only arrangement possible outlined in NPA will kill sport aviation. The skill test requirement is set, which will increase cost of the license hugely. Applicant must either attend a training course arranged part-147 approved organization. The training course (for 66L) is not defined, what is consist, this is a real money maker for p147 organisation. Assuming that any p147 is interested of part-66L license, as there is no money in that business. Or attend a 3 (three) days assessment that can only be arranged by p147 approved organisation. The other money maker for p147 organisation. NPA includes a possibility for this assessment to be held by other organisation (in 66.A.25 (a)(iii)) but this possibility is negated in all other points in rules (which must be obeyed). Generally, this NPA bends light aviation needs to same form as larger CAT organization needs. Part-147 outfits will not have motivation, nor will they be interested in fulfilling this role for GA as there is NO MONEY IN IT. All that will happen is that light GA aviation (certainly gliding and ballooning) will die a slow strangulation as competent people retire. If this NPA ideas goes forward unaltered, a huge increase in cost is to be expected. And availability of 66L licensed persons will vanish. There is more than adequate expertise in the movement to safely execute this function internally. Experience has shown that the old way of arranging competent persons to take care of this light aviation needs is a safe route. This is the least risk route! Light GA can not be assumed to be a "mini-CAT" world as this NPA addresses it. This measure as scoped will definitely NOT work for light GA. PDF page 5 top(c) require that self-trained applicants for the basic AML demonstrate an appropriate level of practical skills; Nice idea, only that it is not made possible. NPA is geared to allow only part-147 to arrange these PDF page 6 point (c) Add the requirement for the assessment of practical skills. Add 'Practical Assessment' modules in Appendix I (for B1, B2 and B3) and in Appendix VII (for L), required only for applicants without a regular Part147 basic training. The practical skills will be checked also for self-trained students: improvement in the competencies expected and therefore positive safety considerations. Additional business opportunities for Part-147 organisations. No major drawbacks. Additional burden for applicants without approved training course. In reality this means: Huge increase in cost. This lowers the safety of continued airworthiness for all</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications: Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>light aviation, as availability of new 66L licenses decreases or vanishes. EASA should think also safety, not only greedy business. PDF page 11 Added to 66.A.25 Basic competency requirements (a) The applicant shall demonstrate by examination a level of knowledge that is appropriate to the related subject modules in accordance with Appendix I (applicable to B1, B2 and B3 licences) or Appendix VII (applicable to L licences) to Annex III (Part-66). The examination shall comply with the standard set out in Appendix II (applicable to B1, B2 and B3 licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by: (i) a training organisation that is appropriately approved in accordance with Annex IV (Part147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory. Point (a)(i) - (iii) introduces three ways to conduct skill test; 1) part-147 training organization, 2) competent authority (later NAA) and 3) other organization as agreed by NAA. Only that the later points rules NAA and other organisations out of the possibilities. And later 66.A.25 (c) In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority. So in effect, 66L license is only intended to be a part of part-147 organizations offering. What is said in 66.A.25 (a) (iii) is not possible as point (c) reserves this practical assessment only to part-147 or authority. Later we show that it is not possible even for NAA. (PDF page 14) Also AMC 66.A.25 has the same message. Only part-147 or authority can perform that practical assessment, as EASA form 148 is possible for them only. PDF page 164 bottom. Appendix VII, below table of content: Module 13L is required only for applicants that do not attend a Part-147 basic training course. Appendix VII contains requirements for knowledge and practical skills for part-66L applicants. So this gives two possibility: a) attend a course arranged by p147 (when practical assessment is not required) or b) by attending practical assessment held by p147! Appendix VII, module 13L. The candidate shall demonstrate the required competencies while performing a number of maintenance tasks selected by the training organisation or by the competent authority. PDF 188 Appendix VIII (c) Module 13- Practical assessment The practical assessment shall include an introductory phase where the training organisation, which conducts the assessment, instructs the candidate on the facilities, access to the documents, materials, and tooling. This means in</p>	<p>aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>practice a day or so more time needed for the practical assessment. PDF page 208 AMC to Appendix VIII MODULE 13L — PRACTICAL ASSESSMENT Practical assessment duration is 2 (two) days plus a training session (Appendix VIII (c) Module 13- Practical assessment, PDF 188 bottom). So it is 3 (days). And as practical assessment is reserved to NAA or p147 this means that they are held during working days. Part-66L license is mostly required for non professional flying. Today almost all maintenance is done by non full time mechanics, with good safety record. This arrangement most likely will repel all those who are not looking for full time job. And those who are looking for full time job as mechanics, do not want only 66L lisencc! And what should be included in the practical assessment. That PDF p208 instructs that tasks are selected from table in AMC to appendix VII. So go back to page PDF pages 167 , 185, 186, 187. Page 185. Let us assume that practical assessment is done properly. Then it must be made with tools and aircrafts that are relevant to license. Needing gliders (at least three to cover all material groups), etc. A motorglider, a LSA/ELA1 class aeroplane (tree for material groups), balloon. Normal part147 organization is geared to teach mechanics for heavy aircraft (CS-25 or CS-27/29) in CAT environment. So the majority of samples they have are not relevant for 66L license holder. è They must acquire these samples for this 2 day test. Which they really cannot use for the rest of year. If no part-147 organisation is interested (this is almost 100% sure), then the task of taking this practical assessment is forwarded to authority only. Authority is the second alternative to hold these practical assessments! That third alternative in 66.A.25 (a)(iii) is negated in all other rule points! So they must hire civil servants that are competent on these subjects, and stay current. They must arrange workshop and they must arrange samples for the test. Plus perform that needed training session (PDF 188 bottom). Probably once a year or two or three. A highly unlike scenario. Summing up: this NPA will kill general aviation, by making impossible to get part-66L license.If skill test's would be introduced, a new approach must be considered. An another organization as agreed by authority as said in 66.A.25 (a) (iii) must be given those possibilities as now is granted only to part-147 organisation,This another organization, exemplified by airports organisations in most European countries, must be allowed to; - - Basic training on light aviation maintenance shall be allowed and accepted for these non-147 organisations,- - - They shall be allowed to accept skill tests and certify it in form accepted by authority (i.e. alternative to EASA Form 148),- - A more practical way of integrating training and skill tests</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		must be allowed. To facilitate weekend training courses to be possible. NPA's stiff tree day session is not practical for step by step training.	
122	osk Hyvä Tapa Harrastaa	<p>That third option 66.A.25 (a)(iii) is good. But the information community has, is that presently availability of examinations for L licence has been at best very slowly developing to nonexistent. There is no money in this licence, and it does not serve CAT-world, so obviously, 147 organisations do not see the need to offer them. As an analog, basic pilot licences can be trained by DTO. As this is similarly at the low end of AML, the same kind of declaration procedure should be equally acceptable for training 66L licence skills. But if there are no other guidelines for the third option (point (iii)), standardizing is impossible. Lack of standardization leads to high disparity in how to get L licence in different countries. And this also leads to widely different safety levels.</p> <p>It would be beneficial to equality if EASA would publish AMC on how to arrange this third option. This AMC could be on the lines: AMC1 66.A.25(a)(iii) Organisation arranging examinations for L licence competency requirements shall be:</p> <ul style="list-style-type: none"> <li>· Organization engaged in light general aviation, providing training on maintenance of these aircraft (balloons, gliders, TMSs, ELA1 powered aeroplanes etc). Organization shall have personnel that has proper competency level to arrange training and to evaluate examinations of it. Organization shall have the rights to use enough knowledge test questions to comply with the standard set out in Appendix VII and VIII to annex III (part-66). Organization shall have procedures set for arranging fair and true exams for applicants. Organization shall keep records of those taking part in examinations to comply with Appendix VIII standard. This record shall be made available to competent authority only. Valid laws for personal data storage must be followed. Organisation shall have a named nominated person who is responsible for the organisation's activities regarding competency exams. Organisation shall produce a result document for applicants test to the competent authority of the applicant. Organisation shall make a written contract with the competent authority of providing examinations. Competent authority has the right to control organisation's activity in the competency exams. Procedures similar to DTO of pilot licencing.</li> </ul>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences.</p> <p>Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.</p>
123	Europe Air Sports	<p>Page 15 -18: 66.A.30(e), page 15:AMC 66.A.30 (e), page 18:Proposed text in the NPA: ....Regulation (page 15,16): Additional experience in aircraft maintenance gained at an aircraft maintenance organisation that is approved in accordance with Part-145 or Part-CAO shall, however, be required in order to ensure adequate understanding of the Part-145 or Part-CAO aircraft maintenance environment.AMC (page 18): the minimum additional experience in aircraft maintenance organisation(s) that is (are) approved in accordance with Part-145 or Part-CAO should be:(i) for categories A and L: 6 months;EAS Comment:All but a minority of Part L-license holders are working as independent certifying staff, mostly in club environments, on a voluntary basis. They have a professional career outside aircraft maintenance or are students.They don't have an intention to work in a professional maintenance environment. Due to their professional occupation or student status, it is not possible for them to gain a 6-month practical experience in an AMO.AMO's will be reluctant to admit candidates wishing to receive training in the scope of this article, as they may regard this as assisting in the training of competing technicians. This is causing a business</p>	<p>Noted. 66.A.30(c) does not exclude the possibility for the CA to recognise the experience gained in other organisations like aeroclubs.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		conflict. In some countries, there are no AMO's that are active in the domain that the technician has to be trained for (gliding, ballooning), which would mean that this training either not available, or else irrelevant. Regarding our domain, this measure does not meet any of the objectives as set forth in §2.2 of the NPA. This article will jeopardise the availability of new candidate AML for gliding clubs. It is crucial that this requirement is dropped for L-licenses.	
124	Europe Air Sports	Not included in the NPA:66.A.40 continued validity of the AML We request an evaluation of the requirement in 66.A.40. The renewal requirement involves an administrative procedure only, and serves no real purpose regarding safety or quality: upon renewal, no check is performed regarding skill level, recency or any other aspect. The drawback of this procedure is an administrative burden by the NAA and a cost for the applicant. We see no benefit in this requirement. Could it be dropped, and could the validity period of the license be made unlimited?	Noted. The topic was discussed within RMT.0255 and it was accepted to keep the requirement to renew the licence every 5 years. It is the only means for the licencing authority to have a minimum of oversight on the AML holder.
125	CAA-NO	How can it be managed to get a B2 licence working only in line maintenance environment? The NPA doesn't address the major difficulties the stakeholders have with educating B2 staff due to lack of complex B2 tasks. At the same time, they need to be able to educate B2 staff for those cases where a B2 release is required. More and more type training courses are combined B1 and B2 because of the difficulty of drawing the line between the categories. Does EASA have a plan for mitigating these things? For extending the licence from B1 to B2, there is a need for clarification. When applying for an extension from a B1 AML to include B2, the requirement in 66.A.30(c) and (d) makes it difficult to get enough practice in the B2 field to cover a representative cross section of maintenance tasks on aircraft. We consider a representative cross section of tasks in the B2 category, to include advanced work on wiring/connectors/data busses and so on. These tasks are seldom found by the stakeholders in Norway, which mainly operate large line stations, without base maintenance activities. Definition of B1 privileges for work on avionic systems in 66.A.20(a) 2, and definition of simple test and troubleshooting in GM 66.A.20(a). These definitions of simple test and troubleshooting for a B1 aircraft maintenance license, limits a licensed B1 holder from performing LRU replacements or re-racking. This gives the stakeholders in Norway challenges regarding personnel, since a part of the work performed on regular basis on line requires B2 authorization. There is major differences in how the "10 actions" referred to in GM to Part-66.A.20(a) is interpreted by organisations and CAA's. Extending licence with a new sub-category: for a person that for example has a B1.1 licence, and then starts to work within category B1.3, it seems excessive to demand OJT on first B1.3 rating	Noted. The scope of RMT.0255 is not to redefine the scopes of B1 and B2, although a lot of effort has been made to align the applicability of the BK modules and learning levels. EASA acknowledges the need of simplification of the EU maintenance licensing scheme, also highlighted by the comments received to the survey launched by EASA in 2016 and documented in the report ' <a href="#">Evaluation Report Part-66/-147</a> ' shared with Advisory Bodies. The answers to that survey showed a recognition of the strong added value of Part-66, whose number of categories, although numerous, provide a robust system. However, it is identified that simplification of Part-66 should be sought as much as possible, not only in terms of the number of (sub)categories, but processes too. It is important to highlight that changes to the existing (sub)categories might have a high impact and have to be assessed carefully, which means that more data is needed for a proper risk assessment. As shown in the Best Intervention Strategy on Maintenance 2020, EASA has a pending action for a study to identify the licence categories that may need to be deleted, merged or created.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		on top of the 6 months experience requirement to extend the licence. Have EASA thought about addressing this?	
132	British Airways	OJT requirements should be in Part-145 only (Option (a)). The requirement is already in the MOE and under the complete oversight of the Part-145 organisation. This should place the OJT under one easy reference heading as opposed to several between Part-66 and Part-145.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
133	British Airways	<p>All syllabus sections are highlighted in blue, regardless of whether there were changes or not. this makes it difficult to identify where changes have been made. Exam Questions - Accuracy of question calculations to be given for each section needs to be checked and corrected Example - Appendix 2 - 2.6 - Module 6 states 80 questions (Page 89), however, the top of the syllabus (p 103) B1 - States 100 questions - Count 80 questions. The table on page 26 indicates Module 12 is required for B2 and B2L, but not Module 13?</p> <p><b>P.87</b> Would further requirements for licence modules and more alignment of categories give the potential for limitations on current licence holders? <b>p.39, p.91</b> and Appendix VII <b>P.167</b> How many students would be allowed to be assessed on Module 18 at any one time (instructor/student ratio)? <b>p.145-149 and 155-158</b> With regard to OJT tasks in the AMC not being suitable for all aircraft types, what is in the AMC are only examples. Surely the OJT book would be made as an individual entity by an approved organisation and approved by their own NAA? The acceptance of OJT car+G345ried out under different NAAs is welcome. Would this apply to any understandings between EASA and the UK following the UKs departure from the EU? With regards to being able to start OJT, this should be once an applicant has gained either an A or B licence. This provides a defined standard, which would be easy to ascertain by Managers/Quality departments. Reviewing 50% of basic experience requirement would be time consuming and unclear. Mentors and Assessors – The experience of training other personnel should be able to be accomplished via internal company procedures or, where certificates are held, be able to be transferred from other companies without an onerous procedure to re-qualify. Mentors and Assessors – Clarification would be useful on how</p>	<p>Accepted, but it was very complicated to highlight the changes in the tables. Accepted. Corrections made. P.87: the amendments to Part-66 will not (cannot) have negative impacts on existing licences. P.167, p.145-149 and 155-158 and 150: AMC&amp; GM will provide the necessary guidelines.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>‘Exercised the privileges for at least one/three years’ respectively would work for new aircraft types or new types to an organisation where this experience level would not have been achieved. Mentors and Assessors – At present within our Company, we have LAEs who perform the function of both Mentor and Assessor in the Part-145 workplace, authorised through both company procedures and guidelines laid down by the NAA, and assessing of the OJT Book prior to applications being sent to the NAA is carried out as an Engineering Quality function. This raises some questions:</p> <ol style="list-style-type: none"> <li>1. Can the requirements for the Assessors include “or equivalent” when being approved? This could allow for experienced, non-licensed staff, such as those in the Quality Department to carry out assessments.</li> <li>2. Can the theoretical and practical elements be split among two different Assessors? Could the word ‘exercised’ be replaced for ‘held’ to ensure there are no complex questions on how much experience ‘exercised’ indicates where multiple types are held. Regarding simulated release to service – would the evidence of all releases be required within the OJT book submission? If not, what percentage would you expect to see? Following failed Assessments, can the retake be assessed by the same Assessor or will it need to be a different one? Will there be a standard list of tasks for assessment and would this be decided by the organisation or would it be on tasks available at the time (even if relatively simple)? Tasks within OJT book – ideally 50% Line and 50% Base maintenance. This could be difficult to achieve and the majority of an OJT book (including the required complexity of tasks) could be completed outside of base maintenance. The required diversity of tasks within OJT book (inspections, servicing, etc) would be very difficult to achieve compliance. As only a minimum 50% of the OJT book is required to be submitted these targets would need a detailed analysis of each book submitted or a re-organisation of the accepted format with sections for inspections/servicing/etc and therefore repeated ATA chapters in each of those sections as necessary. Does the OJT mentioned refer to Part-66 Basic, Part-147 Type or both? “Up to 50% of the required OJT may be undertaken before the aircraft theoretical type training starts”, however, there is now a time restraint of three years on the OJT from starting to completion. This means that if someone starts their OJT 18 months prior to sitting the type course, they will only have 18 months to complete the book and submit their application. Would it not be better to tie both together in that the OJT comes into line with the validity of the type training certificates and not allow it to be started before the course? Will there be a standard template for the Recommendation by the Mentors and the Compliance Report required for the completion of the OJT by the Assessors</li> </ol>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		generated by EASA? P150 The use of Maintenance Simulation Training Devices (MSTDs) and Maintenance Training Devices (MTDs) within training was brought up in NPA 2014-22 but was subsequently stopped. Why was the process stopped in the first place only to be resurrected?	
134	British Airways	p.250 Regarding Part-147 courses and the student-centred option, how would 95% attendance be captured?	Noted. From CRD to NPA 2014-22: 95 % of the completion of the content in the case of student-centred method is contained in AMC to Paragraph 3.1(d) of Appendix III to Part-66, point 5.j) and repeated in AMC 147.A.200(f), point 2. AMC, by definition, fall under the are so-called soft rules. Other means of compliance may be acceptable to the competent authorities. By definition, self-paced learning methods (student-centred methods) imply that the student learns at his or her own pace and at the time of his or her preference. This may not be limited to the maximum hours of learning per day.
135	British Airways	p.13 Why would credits be considered for examinations and practical assessments that have expired past the 10 year limit? This would raise the question as to why there is a figure of 10 years anyway. If modules and assessments cannot be completed in a 10 year period, individuals should be made to redo those that have expired. Also, as the practical assessments (Module 18) have a 10 year expiry date and that this module would be carried out after all other modules are complete to be able to determine competencies, if Module 18 expires, there would be a number of Modules 1-17 having expired. Surely credits could not be issued in these circumstances.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
136	British Airways	P.6 Regarding objective (c): How many students would be allowed to be assessed on Module 18 at any one time (instructor/student ratio)? Regarding objective (d): Would further requirements for licence modules and more alignment of categories give the potential for limitations on current licence holders? With regard to moving the descriptive content for the Basic Modules to the AMC, the drawback mentioned is that there is a risk to deviating from the AMC. As the AMC is only one means of compliance, other avenues must also be available as long as the NAA approve such avenues, so deviating from the AMC is not always a bad thing.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
137	European Sailplane Manufacturers Association	<p>The summary (and also the ToR for this task) refer to a survey, launched by EASA at the end of 2016, which was finished and published in 2018. The findings of this study are the main justification of the proposed changes in NPA2020-12. When looking in this survey, the following passages may be found: page 6 - chapter 1.2. Background of the Part-66 and Part-147 rules:....At the time of the publication of this evaluation report, the draft regulatory texts proposed through the following Opinions and affecting Part-66 and Part-147 have not been adopted yet: — Opinion No 05/2015 introducing the B2L and L Part-66 licences; and ....and page 9/10 - chapter 2.1.2. Should the basic licence system (AML issuance) be simplified (number of categories, combination of privileges (e.g. B1.1 + B2), simpler qualification requirements, etc.)? ....The number of L AML subcategories is seen as too complex: consider the need for simplification or combination. Some other respondents recommend the L licence be only based on experience. A power-plant rating could be introduced. However some other respondents consider the L/B2L licences as a way forward and complain about the long-awaited adoption by the European Commission. ...For the European sailplane manufacturers it is therefore complete incomprehensible, why this NPA2020-12 addresses any aspects of the Part-66 with regards to the L-Licence which was introduced after the survey. Before doing any changes there, it should be first a round of feedback to the EASA about the lessons learned with the new L licence. Furthermore this feedback should be taking input from all stakeholders. From our perspective it is therefore not justifiable for this NPA2020-12 to make recommendations to include additional requirements or to tighten requirements on Part-66 with regard to the L licence.</p>	<p>Noted.</p> <p>The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p>
138	Europe Air Sports	<p>Page 11:66.A.20 (b) Privileges - Recency (Not included in the NPA) Text of the regulation: (b) The holder of an aircraft maintenance licence may not exercise its privileges unless: ...2. in the preceding 2-year period he/she has, either had 6 months of maintenance experience in accordance with the privileges granted by the aircraft maintenance licence or, met the provision for the issue of the appropriate privileges; ...EAS Comment: Several EAS member associations have notified us that the current recency requirements in 66.A.20(b) are unworkable for holders of L licences, most of whom typically perform aircraft maintenance work as a part-time or spare time activity on a voluntary basis. Based on initial discussions with EASA we propose the following early draft of a possible solution: Possible solution: Additional AMC (early draft proposal): 3. L1, L2 and L3 licenses: The holder of the L licence may fulfil point 2. of 66.A.20(b) if, during the last 2 years, he/she can demonstrate: an active participation at 2 annual maintenance inspections (or 100-hour inspections), including the release to</p>	<p>Noted.</p> <p>EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p> <p>However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		service of at least one inspection; and the carrying out of one or more of the following activities: aircraft maintenance related training as instructor/assessor or as student; or maintenance technical support/engineering; or maintenance management/planning; or controlling / supervising maintenance activity performed by not licensed personnel.	
140	FNAM	<p>The FNAM (Fédération Nationale de l'Aviation Marchande) is the French Aviation Industry Federation/ Trade Association for Air Transport, gathering the following members: CSAE: French Handling Operators Professional Union CSTA: French Airlines Professional Union (incl. Air France) EBAA France: French Business Airlines Professional Union GIPAG: French General Aviation Operators Professional Union GPMA: French Ground Operations Operators Professional Union SNEH: French Helicopters Operators Professional Union And the following associated members: FPDC: French Drone Professional Union UAF: French Airports Professional Union FNAM, GIPAG and SNEH thank EASA for the publication of consultation NPA 2020-12 "Review of Part 66" about European Regulation. However, unlike the demand from workshops made in 2016, in particular the shortage of ground engineers and technicians, our position (FNAM, GIPAG and SNEH) is clear: "This consultation would not simplify the Part-66, and, on the contrary, it would make it more complicated, by adding more case by case, and more specifications." Hereafter, you will find FNAM, GIPAG and SNEH comments on the consultation NPA 2020-12. For information, FNAM, GIPAG and SNEH would send a post to the French National Authority (DGAC), and EASA in order to take into account the proposals of amendment, written jointly by GIPAG and SNEH, which purpose is to mitigate and remedy the shortage of mechanics. In fact, this problematic is an urgent matter which impacts the entire aviation field in terms of safety and economy. Resolving this mechanic shortage should be a priority in order to limit its impact which, at term, will lead to the close down of several members of the industry, mainly in the General Aviation and Helicopters fields.</p>	<p>Noted. The scope of RMT.0255 is not to resolve all the issues of Part-66, but more realistically to focus on some more urgent ones.</p> <p>EASA acknowledges the need of simplification of the EU maintenance licensing scheme also highlighted by the comments received to the survey launched by EASA in 2016 and documented in the report '<a href="#">Evaluation Report Part-66/-147</a>'. The answers to that survey showed a recognition of the strong added value of Part-66, whose number of categories, although numerous, provide a robust system. However, it is identified that simplification of Part-66 should be sought as much as possible, not only in terms of the number of (sub)categories but processes too. It is important to highlight that changes to the existing (sub)categories might have a high impact and have to be assessed carefully, which means that more data is needed for a proper risk assessment. As shown in the Best Intervention Strategy on Maintenance 2020, EASA has a pending action for a study to identify the licenses categories that may need to be deleted, merged or created.</p>
141	FNAM	<p>You will find below FNAM comments related to</p> <p>3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66): 66.A.5:</p> <p>The group 1 should include the definition of complex motor-powered aircraft as defined in (j) of Article 3 of regulation (EC) No 216/2008: (ii) a helicopter certificated: - for a maximum take-off mass exceeding 3 175 kg, or- for a maximum passenger seating configuration of more than nine, or- for operation with a minimum crew of at least two pilots, 'helicopters' by itself is not adapted. As well as for aircrafts, the criteria are not adapted.</p>	<p>Noted. Group 1: the definition will be further improved by RMT.0731 introducing aircraft with electrical propulsion and not conventional aircraft.</p> <p>66.A.20 Cat C experience: RM group believes that experience on CMPA is different from experience on other-than-CMPA.</p> <p>66.A.25: Accepted, the 'attitude' has been removed from the assessment.</p> <p>66.A.45 and AMC 66.A.45 (i): Module E is removed. RMT.0731 will define the prerequisite for aircraft with electrical propulsion and others.</p> <p>GM 66.A.45: so far the B2 is rated on the aircraft type and not on component.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>66.A.20: As it is highlighted in P-50-00 on page 14, if the experience does not include at least one year on base, the candidate shall demonstrate a sufficient knowledge of the certifying staff's role and responsibilities for category C. This requirement is true whether the aircraft is complex or not. If the candidate demonstrates the required knowledge, why should it justify an additional of 3 years of experience on a complex aircraft? By fact, a staff capable of being C on a non-complex aircraft should also be capable to be C on a complex aircraft.</p> <p>66.A.25: Objectively, how and on which basis can attitude be examined? Module 18: why not extending it to candidates with a Part-147? It corresponds to a real final assessment compared to the continuous practical exercises.</p> <p>66.A.30: Why is (g) added?</p> <p>66.A.45 and AMC 66.A.45 (i): Why is the Module E not included for the B2? The case of the electric motor is not processed in the other modules.</p> <p>GM 66.A.45: For the B2 staff, the Type-Ratings don't make sense and are expensive for the maintenance organizations. They should have the possibility to follow and demonstrate their knowledge and skills on devices rather than on machines. A device installed on an aircraft will be the same (though some interface adaptations) with similar characteristics and architecture regardless of the aircraft. A device being certified on a machine, the constructor is able to train the technicians on the characteristics, and the maintenance staff on the specifications. For the B2, the technical training could be at the constructor and could not be attached to a model course.</p>	
142	FNAM	<p>You will find below FNAM comments related to 3. Proposed amendments and rationale in detail  </p> <p><b>3.1.</b> Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66):</p> <p><b>Appendix I:</b> Addition of the mention "C": should the existing owners of licenses retake the modules?</p> <p><b>5.16:</b> What are the notions addressed?</p> <p><b>7.16:</b> A level 3 would be more relevant</p> <p><b>9.10:</b> Why is the Dirty Dozen method compulsory?</p> <p><b>10.1 &amp; 10.3:</b> How can we ask a know-how on regulation?</p> <p><b>10.8:</b> Duplicate with M9</p> <p><b>10.10:</b> Why adding this course now since it does not correspond to a content for the moment</p> <p><b>GM to Section 1 of Appendix I:</b></p> <p>Were there occurrence reports which justified the increase of level on the</p>	<p>Appendix I: Addition of the mention "C": should the existing owners of licenses retake the modules? Noted. No, the table clarifies the modules required for Cat. C.</p> <p>5.16: What are the notions addressed? Accepted. The subject is removed and transferred to M10.10</p> <p>7.16: A level 3 would be more relevant Noted. Yes, but not necessary for the AML holder.</p> <p>9.10: Why is the Dirty Dozen method compulsory? Noted. Because the 12s are the recognised most important factors in HF maintenance discipline.</p> <p>10.1 &amp; 10.3: How can we ask a know-how on regulation? Noted. A minimal (lowest level 1) knowledge is required.</p> <p>10.8: Duplicate with M9 Accepted. Now SM is only in M9.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>theoretical knowledge of the category C?</p> <p><b>AMC to Section 2 of Appendix to Part-66:</b>  <b>Module 10:</b> rise of the requirement level regarding regulation equivalent to a know-how which is not relevant  <b>Module 10.9:</b> EMAR: there is no equivalence between the civil and military license. The addition of this course has no add value.</p> <p><b>AMC to Section 3 of Appendix I to Part-66:</b>            If the module 9 is taken into account, so should be the module 10. Appendix II: Rise of the number of questions, especially for the B3, what justifies it? How will "mental skill" be assessed in an objective way?            Appendix III: 'This point is too burdensome and complex. The differentiation between the mentor and assessor complexifies the process especially for the small and medium structures which's staff is limited. As Part-145 are not training organizations, on which basis will they justify that they have the adequate experience to train the candidates. Suggestion of an 'independent observer'. How is he chosen? There are no criteria. If the OJT is signed par the stakeholders, it is not relevant to add a compliance report as it complexifies the process and adds delays without any added value. The OJT should be adapted to the mechanic's experience as it is not taken into account in the actual regulation. Appendix IV: The recent experience for the category is minimum 3 months and maximum 1 year. Table A; why is there sometimes a long waiting time between two demands of different licenses. Appendix VIII: Increasing the number of questions in the module is not justified.</p>	<p>10.10: Why adding this course now since it does not correspond to a content for the moment            Noted. Cybersecurity is an important subject that AML holder should be aware of, also at low level.</p> <p>GM to Section 1 of Appendix I: Were there occurrence reports which justified the increase of level on the theoretical knowledge of the category C?            Noted. Cat. C shall have the same level of basic knowledge as B1 or B2.</p> <p>AMC to Section 2 of Appendix to Part-66:            Module 10: rise of the requirement level regarding regulation equivalent to a know-how which is not relevant            Noted.            Module 10.9: EMAR: there is no equivalence between the civil and military license. The addition of this course has no add value.            Noted. A minimal level of knowledge of other regulations is required to understand the boundary limits of the Part-66 licence.</p> <p>AMC to Section 3 of Appendix I to Part-66: If the module 9 is taken into account, so should be the module 10.            Noted.</p> <p>Appendix II: Rise of the number of questions, especially for the B3, what justifies it?            How will "mental skill" be assessed in an objective way?            Noted. Modules 18 and 13L have been removed.</p> <p>Appendix III: 'This point is too burdensome and complex. The differentiation between the mentor and assessor complexifies the process especially for the small and medium structures which's staff is limited. As Part-145 are not training organizations, on which basis will they justify that they have the adequate experience to train the candidates.            Noted. Mentors and assessors have different roles and responsibilities. Conflicts of interest shall be avoided.            Suggestion of an 'independent observer'. How is he chosen? There are no criteria.            Accepted. Criteria added in AMC.            If the OJT is signed par the stakeholders, it is not relevant to add a compliance report as it complexifies the process and adds delays without any added value.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>The OJT should be adapted to the mechanic's experience as it is not taken into account in the actual regulation. Noted.</p> <p>Appendix IV: The recent experience for the category is minimum 3 months and maximum 1 year. Table A; why is there sometimes a long waiting time between two demands of different licenses. Noted. The 'waiting time' is proportionate to the time necessary to accumulate experience on the new licence category.</p> <p>Appendix VIII: Increasing the number of questions in the module is not justified. Noted. It is justified by the analysis made by the RMT.0255 subgroup of experts dedicated to the basic knowledge requirements for L licences.</p>
143	European Helicopter Association	AMC.66.B.115The competent authority should accept OJT and the process approved by another competent authority within the EASA member states in order allow skills to be easily transferred throughout the member states.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
144	European Helicopter Association	66.B.400The credit issued/approved by one member state must be recognised by all other member states in order to create a level playing field for engineers.	Accepted.
146	European Helicopter Association	66A25How do you assess attitude? This is a very subjective area and can be based on the relationship between the candidate and the assessor . Perhaps some criteria need to be provided in this area	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
147	European Helicopter Association	66A25 para BDoes this now mean the category B license doesn't now encompass L licenses? Are L licenses now separate?	B1.2 and B3 knowledge and experience still cover L1 and L2 experience up to ELA1 piston aeroplanes.
148	European Helicopter Association	66A30 para 5 Higher education obtaining approval from the Authority can be expensive and the reason why some Universities haven't applied. If the Authority issued criteria for approval this would reduce the cost of compliance for degree and other higher educational establishments.	Noted. NCAs should establish the equivalence between their national education curriculum and the basic knowledge requirements established in the modules of Appendix I.
149	European Helicopter Association	Page 229 A2Task abbreviations aren't clearly defined and there is no list of abbreviations	Noted. It is the same abbreviation used for TT practical tasks.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
150	European Helicopter Association	Annex 3 Appendix 36.3.1. General requirements:The OJT shall involve actual task performance on aircraft and components, covering line and base maintenance activities. Not all Maintenance Organisations will be approved for Base Maintenance and to have an engineer at a base maintenance facility for a prolonged period will have significant cost implications for some organisations if they can get access	OJT can be split and performed in diverse Part-145.
151	European Helicopter Association	Annex 3 Appendix 36.3.2 Personnel requirements:General comment; The NPA would appear to be treating a Part 145 Maintenance Organisation as if they are a Part 147 Training Organisation, which they are not. These roles as defined would maybe be better incorporated into Part 145.	Noted. Indeed , the OJT is to be carried out in a Part-145 or CAO organisation.
152	European Helicopter Association	Annex 3 Appendix 3Mentors- Brand new to be specifically approved by Authority (only Form 4 staff are at the moment). This is a *Big change*	Noted. These persons are accepted and not approved by the authority. MOE 3.15 shall list these identified persons.
153	CAA-NO	CAA-NO sees the positive sides of moving the requirements regarding OJT from Part-66 to Part-145. We think this would enhance the understanding in the Part-145 organisations that it is in fact they who have the responsibility for the quality of the OJT process and that the assessment of competency of the persons undergoing OJT is also the responsibility of the Part-145. This would also remove/ limit the complications that comes from Part-66/145/CAO often being organised in different departments in the N-CAA's.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
159	European Helicopter Association	Annex 3 Appendix 3We currently authorise all type-rated authorised engineers and they are not specifically trained as trainers. Small comment: it will be more difficult to manage availability of a mentor over different shift patterns etc.	Noted. Roles and qualifications of mentors and assessors are clearer and more definite now.
160	European Helicopter Association	Annex 3 Appendix 3Assessor needing to be type-rated for three years is new. I am currently the main assessor for CHC Scotia and not type-rated. This will mean that the assessor will be a maintenance engineer and therefore possibly some independence will be lost from this process change. They will require training in examining others which is another cost.	Noted. Roles and qualifications of mentors and assessors are clearer and more definite now.
161	European Helicopter Association	page 42 45Module 3 has changed its name to ELECTRICS FUNDAMENTALS - does not read well in English.	Accepted. correct keep M3 name: Electrical Fundamentals
162	European Helicopter Association	page 46 48 Module 5 has many changes, like some areas are lower knowledge levels for B1. A new element introduced 5.16 Cybersecurity high level concepts - but this element has no examination questions.	Accepted. Cybersecurity subject removed.
163	European Helicopter Association	page 49Module 6 still includes wooden structures for B1.3 which is strange as there are no wooden structured gas turbine powered helicopters.	M6 covers now B1 and B3 so also B1.2/B1.3/B1.4), not Accepted



COMMENT NUMBER	ORGANISATION	Comment	EASA response
166	European Helicopter Association	page 52 Module 7 contains a new element for 'additive manufacturing' - more commonly known as 3D printing. The intent is to raise awareness of 3D component failure modes, this includes a fairly large number of questions in the exam for this topic. Surely this is more related to Part-21 rather than Part-145?	Not Accepted. The intention to include additive manufacturing is the existing possibility for an AMO to produce tertiary (non-structural) parts through data from the OEM with a 3D printer. This should be covered as an introduction only.
168	European Helicopter Association	page 54-56 Module 9 has been changed to the same levels across all licences. This is a good idea as it was only a small difference but some NAA's would not accept a pass at A level as a B equivalent	Noted. Once this 'new' M9 is applicable, 'old' M9 CofRs may be used for a period of up to 10 years for AML application with the limits of time of issue. New M9 will not have limits, so we do not foresee any issues. Normally the NCA may not need to mandate the new M9 COR.
169	European Helicopter Association	page 58 Module 10 includes a blank reference to a regulation (EU)..../.... Referring to security risks in aeronautical information systems. This is probably meant to refer to ED 2020/006/R mainly CS-27 and Part-21 design related	Noted.
170	European Helicopter Association	page 34 Module 12 has no APU topic, and appears in Module 15 at L2 which is too low compared to fixed wing APU L3.	Noted. APU is in M15 for B1 at level 2 for both airplanes and helicopters. 12.16 has been restored in M12 at level 3 for B1.3 and B1.4.
171	European Helicopter Association	page 35-128 Module 13 still has rotorcraft flight controls under ATA 27 which is fixed wing only. Should read ATA 27/67. This omission appears in multiple locations.	Accepted, ATA 27 for helicopters is ATA 67.
172	European Helicopter Association	page 141 New re-worded provision for Multimedia based training (MBT) elements but no explanation to show how this should be implemented or what is acceptable.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
173	European Helicopter Association	page 87 Essay paper examinations have Module 9 omitted in the description due to removal of 9A and 9B but they have failed to include the new 9 in the description.	Noted. Now there are no essay questions for M9.
174	European Helicopter Association	page 84 Cat A practical task list Table (a) has 17 dedicated tasks but a number are for fixed-wing operators only, (4) Ovens, (9) Toilets, (11) Overhead storage compartments, (14) in-flight entertainment systems. This reduces the availability of tasking for helicopter students by 23%.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
175	European Helicopter Association	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
176	European Helicopter Association	page 84 It is not made clear what a successful tasking of practical for B1 or B2 would be acceptable to EASA. What are the minimum acceptable tasks?	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
177	European Helicopter Association	page 151 There is a suggestion that a B1+B2 holder could attend a combined type training course (B1+B2) and complete the basic practical elements to obtain B1 type rating endorsement. After 3 years an endorsement could be applied for in the B2 category, along with the missing B2 practical tasks. This would be	Noted. In this case only, the differences training expires in 3 years.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		problematic as the validity of the original type course certificate of recognition would have expired after 3 years.	
178	European Helicopter Association	General comment Overall there has been a shortage of Part 66 Licensed Engineers and the demographics within the industry suggest that this problem may get worse which has been exacerbated by the current pandemic. We need to consider if the NPA assists in removing some of the existing barriers such as transfer and recognition of approvals and training between member states	Noted. The NPA introduces a condition of mutual recognition of the examinations carried out by an NCA.
179	LBA	<p>LBA comments: General comments: We welcome the NPA 2020-12 and appreciate the work EASA put into this proposal and generally agree with the aims and intentions of this NPA. General comment Appendix I It would be better to not define the practical assessment as module 18 as this would put an “end cap” on the modules. Better define it just as “Skill Module” or something along the lines without a module number. Keep the numbers for theoretical knowledge. We welcome the standardizing of the modules between the different categories and the corresponding elimination of the A/B/C variants. The separation of the content of the modules and module description between the AMC and Rule is not required. We would favour to keep the modules fully in the rule. They are not volatile enough to warrant the separation and this will lead to a possible avenue for diverging content in the future with AltMOC. That would endanger the common recognition as all the modules from all the approved organisations being equal. Please move the electric propulsion module into this appendix General comment AMC to Section 2 of Appendix I We welcome and support the updating of the module contents; however we feel it is unnecessary to move the content into the AMC. This will increase the risk of diverging modules through the member states and will lead to discussions along the lines that this content is only one of many ways to fulfill the rule in Appendix I. General comment AMC to Appendix II We highly welcome the standardization of the question distribution in the modules. The AMC to Appendix II should be amended by including the essay questions as well, alternatively the GM should offer some guidance on the matter. General comment AMC to Section 6 of Appendix III We support the clarifications on the OJT provided in this NPA. General comment Appendix VII We welcome and support the refinements proposed for the modules for category L.</p>	<p>General comments: We welcome the NPA 2020-12 and appreciate the work EASA put into this proposal and generally agree with the aims and intentions of this NPA. EASA: Noted.</p> <p>General comment Appendix I It would be better to not define the practical assessment as module 18 as this would put an “end cap” on the modules. Better define it just as “Skill Module” or something along the lines without a module number. Keep the numbers for theoretical knowledge. EASA: Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p> <p>We welcome the standardizing of the modules between the different categories and the corresponding elimination of the A/B/C variants. Noted.</p> <p>The separation of the content of the modules and module description between the AMC and Rule is not required. We would favour to keep the modules fully in the rule. They are not volatile enough to warrant the separation and this will lead to a possible avenue for diverging content in the future with AltMoC. That would endanger the common recognition as all the modules from all the approved organisations being equal. Not accepted. There is a need to make the rule ‘future proof’, making it easier and quicker to update with the progress of the technology. Diverging from the AMC with an AltMoC is not an easy and straightforward process. The AltMoC shall demonstrate the same level of compliance.</p> <p>Please move the electric propulsion module into this appendix</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.</p> <p>General comment                      AMC to Section 2 of Appendix I                      We welcome and support the updating of the module contents; however we feel it is unnecessary to move the content into the AMC. This will increase the risk of diverging modules through the member states and will lead to discussions along the lines that this content is only one of many ways to fulfill the rule in Appendix I.</p> <p>Not accepted. There is a need to make the rule ‘future proof’, making it easier and quicker to update with the progress of the technology. Diverging from the AMC with an AltMoC is not an easy and straightforward process. The AltMoC shall demonstrate same level of compliance.</p> <p>General comment                      AMC to Appendix II                      We highly welcome the standardization of the question distribution in the modules.                      The AMC to Appendix II should be amended by including the essay questions as well, alternatively the GM should offer some guidance on the matter.                      Noted.</p> <p>General comment                      AMC to Section 6 of Appendix III                      We support the clarifications on the OJT provided in this NPA.                      Noted.</p> <p>General comment                      Appendix VII                      We welcome and support the refinements proposed for the modules for category L.                      Noted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
180	LBA	<p>LBA comment Section 2.1 We would like to point out that the issue of a Category A for large commercial airships is not yet resolved and while the community concerned with this issue is not large, it is still a part of the European aviation sector that should not be forgotten. Another issue to adapt is the current references in 66.B.500 which do not cover Part-ML yet. Please add in comparable measures for independent CS performing complex maintenance as are in place for the “Airworthiness review staff acting on their own behalf”. Recently the amount of Independent Certifying Staff has increased and they are not overseen as have been the Part-ML (and formerly Part-M.F), Part-145 or now the Part-CAO. This opens up an oversight gap. While it is justified to not burden them on the same level as the mentioned organisations, it is nonetheless better to implement a bit of oversight. We would recommend to require a notification to the authority from whom the licence holder has received their Part-66 and a handing in a yearly record of performed RTS. This would only be a light burden compared to now as the list already needs to exist and the notification could be a simple notification. Please add in a duration after which conversions according to 66.A.70 are no longer possible (no later than 10 years after introduction of the concerning privileges). There is no point that a conversion of a pre-EASA licence for large aircraft should still be possible... Another point that the GA community is struggling with are the avionics licences for small aircraft. The B2L is well meant but is currently not serving the community as intended. We would encourage a rethink of the B2L as a B2 for ELA1 aircraft (i.e. a B2 for 1200kg with a Rating covering all ELA1 aircraft) which covers all avionics aspects and move its basic knowledge in a simpler form into appendix VII/VIII. At the same time the B3 should be abandoned as its core demographic has been better served since the introduction of the L-licences with the L2 and in rare cases with the B1.2. We welcome the aim to standardize the use of credits, OJTs and one off type rating courses across the member states, but we would encourage defining the acceptance from other member states on a voluntary basis during a first step and then mandate it during the next revision of Part-66, once the best practices have been collected.</p>	<p>Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) ‘Airships’ envisaged in the EPAS (European Union Aviation Safety Agency)</p>
181	LBA	<p>LBA comment Section 2.4 With regards to the specific request to stakeholders “Objective a” (Page 7), this will resolve most but not all issues with small piston engine aircraft in the Group 1. It may be better to remove the FL290 condition completely. For example the type rating “Cessna 400 Series (Continental)” would partially remain in Group 1. The specific request to stakeholders “Objective b” (Page 8), as a reply to both a) and b) we feel that this would make it much more company specific than it already is. The OJT as it was and as it is proposed in this</p>	<p>Definition of Group 1 has been changed in order to remove simple small piston engine aircraft. However, RMT.0731 will improve the definition of Group 1 adding conditions for electrical/hybrid aircraft and not conventional aircraft.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		document is a part of the initial training for most Certifying Staff and hence should be grouped with the other aspects of this training. Moving it into the Part-145 would also lock it into the commercial aircraft sector, but OJTs may be needed for small non commercial group 1 aircraft in a Part-CAO (which is pointed out by this proposal in the proposed changes to the AMC for the OJT). In terms of the specific request to stakeholders "Objective e" (Page 8), we generally support the proposal to include electric aircraft properly into Part-66. However we disagree with in the details of the proposed implementation. We would prefer to have either clear new categories for the electric aircraft or merge it properly into the B1.2/B1.4.	
182	LBA	<p>LBA comments: Section 3 <b>66.A.5 (Page 10)</b> Currently the group 1 states "Group 1: complex motor-powered aircraft, helicopters, helicopters with multiple engines,...", stating helicopters first without qualifiers before restating it with the qualifier multiple engines would define all helicopters as Group 1, this is likely not intended. The implementation of electric aircraft as Group E does not fit into the numbered system of the groups. We would also encourage to create subgroups in this group for the different airframes similar to 2a, 2b. The existing (sub-)groups should be rephrased in order to properly cover the rotorcrafts other than traditional helicopters. Our proposal would be: (ii) subgroup 2b: - single turbine engine rotorcraft, - those multiple turbine engine rotorcraft classified by the Agency in this subgroup because of their lower complexity. (iii) subgroup 2c: - single piston engine rotorcraft, - those multiple piston engine rotorcraft classified by the Agency in this subgroup because of their lower complexity. Group 5: electric propulsion aircraft other than those in Group 1 belonging to the following subgroups: (i) Subgroup 5a: - electric propulsion aeroplanes, .-those electric propulsion aeroplanes classified by the Agency in this subgroup because of their lower complexity. (ii) Subgroup 5b: - electric propulsion rotorcraft, .-those electric propulsion rotorcraft classified by the Agency in this subgroup because of their lower complexity. (iii) Subgroup 5c: - electric propulsion airship, .-those electric propulsion airship classified by the Agency in this subgroup because of their lower complexity. (iv) Subgroup 5d: - other electric propulsion aircraft, .- those other electric propulsion rotorcraft classified by the Agency in this subgroup because of their lower complexity. Subgroup 5d would allow to cover other electric aircraft which might not fit into the currently used traditional categories. <b>GM 66.A.5 (Page 11)</b> The table is not fully correct. There are no Group 4 aircraft possible in the current (or proposed) Category L5. Further there are possibly electric aircraft in the L4H/L4G.</p> <p><b>66.A.20 (Page 11)</b> We welcome and support this clarification of the scope of the</p>	<p>Section 3 66.A.5 (Page 10) Noted. The changes to the Group 1 definition have been limited to the essential (removal of all piston engine aircraft) because RMT.0731 will further change and improve the definition of Group 1 adding electrical aircraft and consequentially revise the definitions of the other groups.</p> <p>GM 66.A.5 (Page 11) Accepted. AMC &amp; GM will be corrected accordingly.</p> <p>66.A.20 (Page 11) Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b)2, making it proportionate for L licences, but this action needs to be dealt with through another RMT.</p> <p>66.A.25 (Page 12 &amp; 13) Accepted.</p> <p>66.A.25 (Page 13) 66.A.25(c) Noted.</p> <p>66.A.25(e) Accepted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Category C CMPA. There are currently in the flying clubs worries about how to maintain their privileges in respect to the required experience of 6 months in the previous two years before a sing-off (66.A.20(b)(2) and its AMC/GM). When the category L was put forth in the CRD, it included measures in the AMC/GM to clarify this issue. These conditions were not taken over into the final AMC/GM. This topic should be clarified.</p> <p><b>66.A.25 (Page 12 &amp; 13)</b> The proposal forgot to include category A (and arguably in some cases C) in all the proposed texts. We propose to replace “Appendix I (applicable to B1, B2 and B3 licences)” with “Appendix I (applicable to A, B1, B2, B3 and C licences)” and “Appendix I (applicable to A, B1, B2 and B3 licences)” as appropriate.</p> <p><b>66.A.25 (Page 13) 66.A.25(c)</b> should list the same possible places for the practical exam as does 66.A.25(a). Our proposed text would be: In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment. The practical assessment shall comply with the standard set out either in Module 18 of Appendix II (for A, B1, B2 and B3 licences) or in Module 13L of Appendix VIII (for L licences) to Annex III (Part-66) and shall be carried out either by: (i) a training organisation that is appropriately approved in accordance with Annex IV (Part-147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory.</p> <p><b>66.A.25(e)</b> should be amended to make it much clearer that the competent authority may grant credits for the practical assessment (as is indicated by the proposed 66.A.25(e)(ii)). We propose to slightly rephrase the first sentence of the current proposal and bring it in line with the title of the paragraph: The applicant may apply to the competent authority for full or partial credits for the basic competency requirements for: ...</p> <p><b>66.A.30 (Page 14-16)</b> We welcome the clarification related to the category C. The statement under 66.A.30(g) concerning the credit courses might be better as a part of 66.A.25.</p> <p><b>AMC 66.A.30(a) (Page 16)</b> We welcome the clarification related to the category C. One case not yet covered is the question if a Category C applicant both holds a B1/B2 as well as an academic degree.</p> <p><b>GM 66.A.30(a) (Page 16 &amp; 17)</b> We welcome the clarification related to the category C. We propose to clarify the section on the 1 year period for the academic Category C in the section “Experience in working in an aircraft</p>	<p>66.A.30 (Page 14-16) Noted. The text is now introduced in both A.25 and A.30.</p> <p>GM 66.A.30(a) (Page 16 &amp; 17) Noted. The final AMC &amp; GM will provide appropriate guidelines for point.</p> <p>AMC 66.A.30(e) (Page 18) Noted. The final AMC &amp; GM will provide appropriate guidelines for point.</p> <p>66.A.45 (Page 18-19) Not accepted. The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.</p> <p>AMC 66.A.45(i) (Page 19-20) Not accepted. The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.</p> <p>GM 66.A.45 (Page 21-22) Not accepted. The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.</p> <p>66.B.115 (Page 22) Noted</p> <p>AMC 66.B.115 (Page 22) Noted</p> <p>66.B.130 (Page 23) Noted</p> <p>66.B.135 (Page 23)</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>maintenance environment on a representative selection of tasks that are directly associated with aircraft maintenance”: For a category C licence obtained through the academic route, this 1-year period includes the participation in the performance of base maintenance tasks for 6 months in a Part-145 or Part-CAO environment and the remaining 6 months in an initial or continuous airworthiness organisation according to Regulation (EU) 2018/1139.</p> <p><b>AMC 66.A.30(e) (Page 18)</b> This may create issues for the flight clubs and Annex I aircraft maintenance.</p> <p><b>66.A.45 (Page 18-19)</b> The proposal will create a new complicated system in the already complicated world of the categories. The proposal also lacks a corresponding way for Category A licences. We would favour to expand the privileges of the current B1.2/B1.4. If the intention is to keep those purely piston engine focused, then it would be better to include more categories and simpler to understand categories. If the aim is to go to the path of “engine”-system ratings, then it should be introduced fully or not at all. I.e. a B1 with aircraft ratings (Aeroplanes or Helicopter) and engine ratings (Piston, Turbine and Electric)... However we believe such a huge shift is not warranted in an accepted and mostly well running system. A more traditional alternative would be a B1.5 and B1.6 for electric aeroplanes and rotorcraft with a generous transfer requirement from the existing Category B1. This would keep the current system properly straightforward and would lead to the equivalent result. The electric module should be moved to the existing Appendix I and Appendix II where all the other modules are found. The current module with 10 questions (not a multiple of 4 as should always be the case for a proper 75% pass) is unfairly short. The experience with the current Category L modules shows that modules with few questions are more likely to be failed. They are more subject to “bad luck” circumstances (misunderstood questions, unfortunate random question selection, mistake in crossing the answers, etc.). We recommend a 20 question minimum for all modules in order to reduce the “bad luck” element and give the applicant a fair chance in passing it. We would also caution against not demanding any experience on electric aircraft, the main difference to the currently common aircraft is the far higher and possibly deadly danger of the electric systems. We encourage demanding a minimum of experience on such systems.</p> <p>AMC 66.A.45(i) (Page 19-20) As with the module itself this AMC should be G144 located in the AMC with all the other modules.</p> <p>GM 66.A.45 (Page 21-22) Once again the possible electric propulsion airships are not taken into account.</p> <p>66.B.115 (Page 22) No remarks.</p>	<p>This text is the final output of the RMT.0281 ‘New training and teaching technologies’. Refer to CRD to NPA 2014-22.</p> <p>66.B.200 (Page 23) Noted</p> <p>66.B.400 (Page 24) Noted. The final AMC &amp; GM will provide appropriate guidelines for point.</p> <p>66.B.405 (Page 24) Noted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>AMC 66.B.115 (Page 22) No remarks.</p> <p>66.B.130 (Page 23) No remarks.</p> <p>66.B.135 (Page 23) Most of the points would be better made if it is shifted into Part-147 and refer to those conditions from 66.B.130 for the one off approvals. If this needs to remain in Part-66 then the irrelevant referral to the Appendix I (basic knowledge modules) should be removed.</p> <p>66.B.200 (Page 23) No remarks</p> <p>66.B.400 (Page 24) The acceptance of each other's credit report will be a big step. While we see it as part of the integration and free movement in the European Union we would appreciate a bit more guidance on the implementation in an AMC/GM.</p> <p>66.B.405 (Page 24) What exactly is meant by the "possible conditions"? The phrasing is open for interpretations.</p>	
183	LBA	<p>LBA comments: Appendix I (Page 25) B3 should have a cross for Modules 16 and 17 (Piston engines and Propeller).</p> <p><b>Appendix I (Page 26)</b> Module 12 is missing the Rotorcraft in the name and is now required for B2/B2L. This is likely a mistake. Additionally the cross at module 12 for B2/B2L is wrongly applied. Please add "Note: Module 18 is required only for applicants that do not attend a full Part-147 basic training course."</p> <p><b>Appendix I (Page 31)</b> We support the proposal to make Module 9 common between all categories.</p> <p><b>Appendix I (Page 32)</b> Module 10 in the submodule 10.6 has no levels mentioned. Correct according to the AMC would be for A – and for B1, B2, B2L and B3 a Level of 1. Is cybersecurity the responsibility and in the knowledge of the Certifying Staff in terms of Aviation Legislation?</p> <p><b>Module 11 in the submodule 11.4.2</b> has no levels mentioned. Correct according to the AMC would be for A1 a Level of 1, A2 a Level of 1, B1.1 a Level of 3 and B1.2 a Level of 3. Module 11 in the submodule 11.4.3 has no levels mentioned. Correct according to the AMC would be for A1 a Level of 1, A2 a Level of -, B1.1 a Level of 3, B1.2 a Level of – and B3 a Level of -.</p> <p><b>Appendix I (Page 33)</b> Please make sure that the B3 is nowhere in M11 lower than the requirements for A2 (see for example 11.3.1(c), 11.4.4, 11.7(b), 11.8(a)). While not all of those are fully applicable for piston aircraft below 2000kg. There is no point not allowing a B3 licence holder to easily acquire an A2.</p> <p><b>GM to Section 1 of Appendix I (Page 39)</b> We welcome and support this clarification.</p> <p><b>AMC to Section 2 of Appendix I – Module 18 (Page 83 - 86)</b> The subject/tasks on aircraft should be more phrased in a way that no aircraft needs be worked on at</p>	<p>Appendix I (Page 25) EASA answer: Noted. B3 should have a cross for Modules 16 and 17 (Piston engines and Propeller).</p> <p>Appendix I (Page 26) EASA answer: Accepted: B3 needs M16&amp;17 knowledge.</p> <p>Module 12 is missing the Rotorcraft in the name and is now required for B2/B2L. This is likely a mistake. EASA answer: Accepted.</p> <p>Additionally, the cross at module 12 for B2/B2L is wrongly applied. EASA answer: Accepted. M12 is not a requirement for B2 and B2L.</p> <p>Please add "Note: Module 18 is required only for applicants that do not attend a full Part-147 basic training course." EASA answer: Noted. Module 18 proposal was not maintained in the amendment and is not included in the Part-66 syllabus.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>this stage of the assessment. The aircraft specific parts are more experience or OJT matters.</p> <p><b>AMC to Section 3 of Appendix I (Page 87)</b> This AMC should also talk about the practical parts of the Basic Training course.</p> <p><b>Appendix II (Page 88)</b> The proposal states “The maximum number of attempts for each examination is 3 in a 12-month period.”, this can be understood in two different ways, either a maximum of 3 attempts to pass the exam is allowed or infinite attempts as long as there are never more than 3 in the space of a year. It should be made clear which of those is meant. Generally speaking we would prefer not to have infinite attempts, but 3 might be a bit on the strict side (we would propose two blocks of three attempts in the space of 12 months with a waiting period in between the two blocks for a maximum amount of six attempts).</p> <p>Module 1 for Cat.A requires 16 questions, as we have stated before in this response, short exams are more likely to be failed due to “bad luck” and we would encourage a minimum of 20 questions in 25 minutes no matter how “easy” the topic is.</p> <p><b>AMC to Appendix II (Page 91)</b> The sentence “Justified deviations from these values are also acceptable, provided the sum of the questions complies with the total number for the module.” will create unnecessary deviations from an EU wide standard. This approach should be reconsidered. Instead allow for a short transition period to keep the currently used distribution to allow the Part-147 to increase their question databases where needed. AMC to Appendix II (Page 139) We welcome the clarification on the scope and duration of the practical assessment.</p> <p><b>Appendix III (Page 140)</b> The point made under (iv), letter (c) in section 1 is not too clearly written and we propose to rephrase it a bit more clearly and eliminate the reference to the basic knowledge which is not relevant in this appendix: (iv) the limit of 3 years (as per points 1(a), (b) and 6 of Appendix III) does not apply to those elements of the theoretical type training, the practical type training and the OJT that were already endorsed on the licence on the same or a higher level in the same or a different licence (sub)category. Appendix III (Page 143) It may be of advantage to use the term assessment/examinations more consistently.</p> <p><b>Appendix III (Page 147)</b> The phrasing “have delivered train-the-trainer courses,” should be replaced with “have received train-the-trainer courses,” as the current text implies they need to have taught these courses not attended them successfully.</p> <p><b>Appendix III (Page 147)</b> We would encourage to define a standardized</p>	<p>Appendix I (Page 31) We support the proposal to make Module 9 common between all categories. EASA answer: Noted</p> <p>Appendix I (Page 32) Module 10 in the submodule 10.6 has no levels mentioned. Correct according to the AMC would be for A – and for B1, B2, B2L and B3 a Level of 1. 10.6 as knowledge requirement is not relevant for Cat A.</p> <p>Is cybersecurity the responsibility and in the knowledge of the Certifying Staff in terms of Aviation Legislation? EASA answer: Not accepted.</p> <p>Module 11 in the submodule 11.4.2 has no levels mentioned. Correct according to the AMC would be for A1 a Level of 1, A2 a Level of 1, B1.1 a Level of 3 and B1.2 a Level of 3. EASA answer: Accepted.</p> <p>Module 11 in the submodule 11.4.3 has no levels mentioned. Correct according to the AMC would be for A1 a Level of 1, A2 a Level of -, B1.1 a Level of 3, B1.2 a Level of – and B3 a Level of -. EASA answer: Same comment as 11.4.1</p> <p>Appendix I (Page 33) Please make sure that the B3 is nowhere in M11 lower than the requirements for A2 (see for example 11.3.1(c), 11.4.4, 11.7(b), 11.8(a)). While not all of those are fully applicable for piston aircraft below 2000kg. There is no point not allowing a B3 licence holder to easily acquire an A2. EASA answer: Accepted.</p> <p>GM to Section 1 of Appendix I (Page 39) We welcome and support this clarification.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>compliance report/OJT certificate for those OJTs approved for the Part-145/Part-CAO which may be handed in at another CAA than the one approving the procedure.</p> <p><b>AMC to point 6.4.3 of Appendix III (Page 157)</b> Please define a minimum of maintenance activity on aircraft that are subject to Regulation (EU) 2018/1139 (we would recommend somewhere between 25% and 50%).</p> <p><b>Appendix IV (Page 158 &amp; 159)</b> We welcome the inclusion of all the licence categories in the transfer tables. A question left open by the current Table A and associated text is the question on the ability of a Category L with the exclusion for complex maintenance to acquire a Category A, B1, B2 or B3. We recommend that in those cases either the limitation needs to be resolved or an additional year of experience needs to be provided.</p> <p><b>Appendix IV</b> shows the requirements for extending a Part-66 licence. Therefore the phrasing in A should not contain “obtaining a licence category or” as this is already covered by 66.A.30. The sentence “The remaining experience may be accumulated in any subcategory 66.A.30(d).” should be reconsidered. The amount of experience in any new subcategory should either be 1 year of if the transfer table states less, the full experience should be in the category in question. A point which might need some clarification in an AMC/GM would be the question on extending the licence with two categories at once (for example a B1.1 applying at the same time for a B1.3 and B2).</p> <p><b>Appendix IV (Page 160 &amp; 161)</b> We welcome the clarification on the Basic knowledge requirements for extending the licence. This will assure equal treatment across the member states and eliminate the current need for a credit report for existing licences. Not clear from this appendix is the need for the practical assessment when extending the licence to another category. Either a statement that a holder of an existing licence does no longer need to provide a practical assessment is needed or the conditions need to be laid out in this appendix.</p> <p><b>Appendix VII (Page 162)</b> The statement “Module 13L is required only for applicants that do not attend a Part-147 basic training course.” makes little sense as there are no Part-147 basic training courses foreseen by the regulation for the Category L licences.</p> <p><b>Appendix VIII (Page 188)</b> We appreciate the increase of the questions to 20 for the short modules. This will make the exams more fair for the examinees.</p> <p><b>AMC to Appendix VIII (Page 190)</b> We welcome the standardization of the question distribution across the memberstates.</p> <p><b>Appendix IX (Page 209)</b> Please make it clear that questions used in MBT</p>	<p>EASA answer: Noted.</p> <p>AMC to Section 2 of Appendix I – Module 18 (Page 83 - 86) The subject/tasks on aircraft should be more phrased in a way that no aircraft needs be worked on at this stage of the assessment. The aircraft specific parts are more experience or OJT matters.</p> <p>EASA answer: Page 83 is clear and at high level. Table A are typical cat A tasks, which will be task trained by 145 at specific Aircraft type prior company authorisation, M18 basics skills needs to be selected and demonstrated. OJT does not apply for CAT A.</p> <p>AMC to Section 3 of Appendix I (Page 87) This AMC should also talk about the practical parts of the Basic Training course.</p> <p>EASA answer: Not accepted. It already gives the general principles of the training methods for Basic Training.</p> <p>Appendix II (Page 88) The proposal states “The maximum number of attempts for each examination is 3 in a 12-month period.”, this can be understood in two different ways, either a maximum of 3 attempts to pass the exam is allowed or infinite attempts as long as there are never more than 3 in the space of a year. It should be made clear which of those is meant. Generally speaking we would prefer not to have infinite attempts, but 3 might be a bit on the strict side (we would propose two blocks of three attempts in the space of 12 months with a waiting period in between the two blocks for a maximum amount of six attempts).</p> <p>EASA answer: Not accepted: No more than 3 exams in a 12 mth period and this could be infinite. If the student needs 7 exams to pass, he or she needs &gt; 24 mth before he could take exam no 7; there is a need for the student to be motivated over a long period of time.</p> <p>Module 1 for Cat.A requires 16 questions, as we have stated before in this response, short exams are more likely to be failed due to “bad luck” and we would encourage a minimum of 20 questions in 25 minutes no matter how “easy” the topic is.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>questionnaires during training may no longer be used as exam questions.</p> <p><b>Appendices to the AMC - Appendix I (Page 213)</b> We appreciate the extension of the type rating list to include electric aircraft.</p> <p><b>Appendices to the AMC - Appendix II (Page 213)</b> Please add some guidance on how to apply the new list to Group 2/Group 3 aircraft for the experience and exam requirements.</p>	<p>EASA answer: Not accepted: Currently there is no evidence present in the WG that this a commonly observed issue, we need to stop increasing the knowledge load and testing load.</p> <p>AMC to Appendix II (Page 91) The sentence “Justified deviations from these values are also acceptable, provided the sum of the questions complies with the total number for the module.” will create unnecessary deviations from an EU wide standard. This approach should be reconsidered. Instead allow for a short transition period to keep the currently used distribution to allow the Part-147 to increase their question databases where needed.</p> <p>EASA answer: Accepted: A generous transition period will be provided to implement these question distribution requirements to the MCQ databases, as it could even be necessary for Part-147 organisations to amend the training material as certain subjects are too short for multiple questions. From standardisation point of view this needs to be the same in every Part-147 organisation. For future developments, such as CBTA and NTT, a solid standardisation standard needs to be enforced.</p> <p>AMC to Appendix II (Page 139) We welcome the clarification on the scope and duration of the practical assessment.</p> <p>EASA answer: Noted.</p> <p>Appendix III (Page 140) The point made under (iv), letter (c) in section 1 is not too clearly written and we propose to rephrase it a bit more clearly and eliminate the reference to the basic knowledge which is not relevant in this appendix: (iv) the limit of 3 years (as per points 1(a), (b) and 6 of Appendix III) does not apply to those elements of the theoretical type training, the practical type training and the OJT that were already endorsed on the licence on the same or a higher level in the same or a different licence (sub)category.</p> <p>EASA answer: Accepted.</p> <p>Appendix III (Page 143) It may be of advantage to use the term assessment/examinations more consistently.</p> <p>EASA answer: Accepted</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>Appendix III (Page 147) The phrasing “have delivered train-the-trainer courses,” should be replaced with “have received train-the-trainer courses,” as the current text implies they need to have taught these courses not attended them successfully. EASA answer: Accepted</p> <p>Appendix III (Page 147) We would encourage to define a standardized compliance report/OJT certificate for those OJTs approved for the Part-145/Part-CAO which may be handed in at another CAA than the one approving the procedure. EASA answer: Accepted: The Part-66 WG has recently discussed this issue; a standardised statement will be beneficial for every stakeholder: students and NCAs.</p> <p>AMC to point 6.4.3 of Appendix III (Page 157) Please define a minimum of maintenance activity on aircraft that are subject to Regulation (EU) 2018/1139 (we would recommend somewhere between 25% and 50%). EASA answer: Not accepted. A minimum number of tasks, expressed in percentage (%) of each category of: INS/inspections, FOT/functional or operational, SGH/servicing, R/I removal and installation, MEL and T/S troubleshooting, should be performed. The competent authority may accept that a limited number of tasks have not been performed as long as the relevant cross section of tasks as regards quality, quantity and complexity is still assured.</p> <p>Appendix IV (Page 158 &amp; 159) We welcome the inclusion of all the licence categories in the transfer tables. A question left open by the current Table A and associated text is the question on the ability of a Category L with the exclusion for complex maintenance to acquire a Category A, B1, B2 or B3. We recommend that in those cases either the limitation needs to be resolved or an additional year of experience needs to be provided. EASA answer: Not accepted: Experience requirements are different from knowledge requirements.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>Appendix IV shows the requirements for extending a Part-66 licence. Therefore the phrasing in A should not contain “obtaining a licence category or” as this is already covered by 66.A.30. The sentence “The remaining experience may be accumulated in any subcategory 66.A.30(d).” should be reconsidered. The amount of experience in any new subcategory should either be 1 year of if the transfer table states less, the full experience should be in the category in question.                      EASA answer:                      Accepted</p> <p>A point which might need some clarification in an AMC/GM would be the question on extending the licence with two categories at once (for example a B1.1 applying at the same time for a B1.3 and B2).                      EASA answer:                      Accepted.</p> <p>Appendix IV (Page 160 &amp; 161) We welcome the clarification on the Basic knowledge requirements for extending the licence. This will ensure equal treatment across the member states and eliminate the current need for a credit report for existing licences. Not clear from this appendix is the need for the practical assessment when extending the licence to another category. Either a statement that a holder of an existing licence does no longer need to provide a practical assessment is needed or the conditions need to be laid out in this appendix.                      EASA answer:                      Not accepted. This Table B is only for knowledge requirements, M18 is now in place to cover these issues when not done in an approved Part-147 training course.</p> <p>Appendix VII (Page 162) The statement “Module 13L is required only for applicants that do not attend a Part-147 basic training course.” makes little sense as there are no Part-147 basic training courses foreseen by the regulation for the Category L licences.                      EASA answer:                      Accepted.</p> <p>Appendix VIII (Page 188) We appreciate the increase of the questions to 20 for the short modules. This will make the exams more fair for the examinees.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>EASA answer: Noted: seems significant knowledge increase for this type of engineers, no data if there are knowledge/skill issues in the part of aviation.</p> <p>AMC to Appendix VIII (Page 190) We welcome the standardization of the question distribution across the member states. EASA answer: Noted</p> <p>Appendix IX (Page 209) Please make it clear that questions used in MBT questionnaires during training may no longer be used as exam questions. EASA answer: Accepted</p> <p>Appendices to the AMC - Appendix I (Page 213) We appreciate the extension of the type rating list to include electric aircraft. EASA answer: Noted. Appendices to the AMC - Appendix II (Page 213) Please add some guidance on how to apply the new list to Group 2/Group 3 aircraft for the experience and exam requirements. EASA answer: Not accepted.</p>
184	LBA	LBA comment: Appendix III (General) We welcome the refined OJT put forth in this proposal and support it.	Noted.
185	LBA	<p>LBA comments: <b>Appendices to the AMC - Appendix II (Page 230)</b> Please add the same checkmarks for “08 Levelling and weighing” for B1 as are present for B2. <b>Annex IV (Part-147) (245)</b> The introduction of distance learning will pose some new challenges which have not been met fully by the proposal. We would encourage to add new requirements to assure an equivalent safety level to the traditional approach. Needed are clear rules for virtual environments and qualifications of teachers in such settings, the presentation of the knowledge is requiring additional skills from the teacher to the ones currently needed. When a Part-147 offers distance learning no one is responsible for the usability of the user interface for this purpose. There have been cases where remote classes have been attended on small mobile devices which are not suited to the topic at hand.</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>There needs to be a clear responsibility of the Part-147 for the end user experience and its applicability to the training objective. There is a strong opposition across the CAAs when asked about online exams. They are too open to abuse, fraud and “publication” of exam questions. Further there is the problem many seem to have with identity checks across the ethnic boundaries. The current NPA puts the responsibility of the distance learning environment fully into the hands of the student. This has proven in the recent experiences as highly problematic. As of now a high variety of issues has arisen, from loud environmental disturbances, unusable online connections, devices not suited for the task at hand and many more. It would help to put the responsibility for these matters clearly at the hand of the Part-147 and not the student. Please define a minimum attendance for student centered learning methods, we would recommend a minimum of 95% for basic training and especially for type training. Clear guidance should be given in the AMC/GM to the Part-147 on how to assure the attendance rate, a pure log in time in electronic systems is not sufficient.</p> <p><b>+G444</b> Please add the access to the relevant ICAO documentation to the requirements.</p>	
186	LBA	<p>LBA comments: <b>GM 147.A.100(i) (Page 246)</b> Can this be rephrased in order to include libraries from other regulatory bodies as well (EMAR, ICAO, FAA, ...) as long as they are compliant with this Part.</p> <p><b>GM 147.A.105 (Page 247)</b> The introduction of GM for new training technologies does not justify to delete the more general statement “It is recommended that potential instructors be trained in instructional techniques.” As even for traditional classroom training instructional techniques exist.</p> <p><b>147.A.115 (Page 247)</b> While we welcome all instruments aimed at improving the training and bringing it to the forefront of teaching technologies, we would advise caution in respect to pure online courses and instead mandate a minimum presence time. We feel that the students benefit most from either a classic course or a hybrid course (first part online, second part classroom and examination/assessment).</p> <p><b>GM to 147.A.115(a);(d) (Page 248)</b> Please remove the to from the title as is proposed with GM 147.A.105(f)</p> <p><b>147.A.120 (Page 248)</b> Please consider the need for a proper course handout, by now many training provider have started to implement software solution not accessible after the training. While this prevents outdated material from being circulated and intellectual property theft, this makes it difficult to refresh the knowledge after the course has concluded.</p> <p><b>147.A.135 (Page 249)</b> Please make it clear that “online exams” are not foreseen</p>	Noted



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>by the regulations. There have been attempts of capturing questions on third devices when using an examination server abroad to capture the questions, hence a net independent solution should be mandated.</p> <p><b>147.A.145 (Page 249)</b> Please specify, that only physical locations are meant here for assessments, not a website or online portal.</p> <p><b>AMC 147.A.145(c) (Page 249)</b> Please remove the online exams, it is too prone to cheating and will undermine the trust into the examinations. The reference to an URL is limiting it, it may be better to use a technological independent phrasing for more futureproofing it. Putting the responsibility of the learning environment on the student is problematic and few have the required background to assess it properly, this responsibility belongs into the hands of the Part-147 which should make clear demands (concerning environmental disturbance, required hardware such as screen sizes and so on).</p> <p><b>147.A.200 (Page 250)</b> While we welcome the inclusion of the new training technologies the possibilities under (g) carries the possibility that online training is made easier than the traditional training. The number of hours should not be less in online trainings than in presence courses. Our experience points to less efficiency in distance learning than in presence courses. Based on these experience gained, we would highly encourage to put forth a factor of between factor 1.2 at the least and a recommended factor of 1.5 times the hours needed for traditional training. Additionally students have trouble to remain concentrated in these conditions after about half an hour. The most difficulties have been noted with younger students who lack professional experience. Additionally we would welcome the inclusion of a sequence for parts in a basic training which should generally for each topic be as follows: 1. theoretical training 2. practical training 3. practical assessment 4. theoretical examination</p> <p><b>Appendices to Annex IV – Appendix III (Page 251)</b> Please provide some more guidance on the proper filling of the CoRs. With the introduction of split modules, new practical module and so on there will be some new variance in the proper filling out across the individual member states, this could be avoided by clearer instructions in an AMC/GM. With the split up of the EASA Form 148 and 149 in a/b/c variants, should they not restart at Issue 1?</p>	
187	LBA	LBA comment: Appendices to Annex IV – Appendix III (Page 254) The CoR EASA Form 149b contains still the type training course, which is not part of the CAAs scope according to this proposal.	Not Accepted. 66.B.200 (d) does not exclude this possibility.
188	UK Civil Aviation Authority	Page No: 13 Paragraph No: 66.A.25 Basic competency knowledge requirements (g) Comment: To clarify the meaning of 'type of aircraft' we recommend the below wording in brackets is added. Justification: Clarity	Accepted. Proposed text will be added.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		Proposed Text: The applicant for the category C licence shall demonstrate by examination the same level of knowledge as for the modules applicable to the B1 or B2 category. The modules shall be relevant to the type of aircraft (either complex or other than complex motor-powered aircraft) the category C licence will be applicable to.	
189	UK Civil Aviation Authority	Page No: 16 Paragraph No: GM 66.A.30(a) Basic experience requirements, para 2 Comment: We suggest the current statement of '3 or 6 months...' is not very clear. Justification: The current wording does not give any guidance when it could be 3 months or when it should be 6 months. Proposed Text: Suggest a clearer statement would be 'at least 6 months...'	Accepted. Text removed. Table provides right indication.
190	UK Civil Aviation Authority	Page No: 17 Paragraph No: GM 66.A.30(a) Basic experience requirements, para 2 and 3 Comment: We believe this experience should be evidenced with an engineering logbook providing details such as date, place, organisation, aircraft registration etc.	Accepted. AMC 66.A.10 already provides sufficient information on how the experience should be recorded. The AMC does not provide any template because it leaves to the authority the freedom to define its own experience logbook.
191	UK Civil Aviation Authority	Page No: 22 Paragraph No: 66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations (c) Comment: The text requires clarification of what type of evidence is to be requested by Competent Authority in cases when OJT was delivered by an AMO whose Competent Authority differs from the Authority issuing the licence. This could include EASA Form 3 AMO approval certificate, evidence of approval of revision of MOE that incorporates procedures under Chapter 3.15 etc. Additionally, clarification if the Licensing Authority should liaise with the Authority that issued the AMO approval or directly with the AMO would be beneficial. Justification: Clarity	Noted. This text will be removed from the rule and kept in AMC as it is now.
192	UK Civil Aviation Authority	Page No: 23 Paragraph No: 66.B.130 Procedure for the direct approval of aircraft type training (c) Comment: Using the Certificate of Recognition (CoR) (EASA Form 149b) for directly approved courses could introduce ambiguity to the licensing process as the EASA Form 149b template does not include a statement confirming that the certified element of training has been directly approved by the Competent Authority. We believe a more appropriate reference would be to EASA Form 149c. This would also be consistent with the amendment of Appendix III to Part 147, as proposed. The intended validity of EASA Form 149c is unclear. If the intended validity for the acceptance of EASA Form 149c is 3 years, similar to EASA Form 149a and 149b, this could be inconsistent with AMC to 66.B.130. AMC to 66.B.130 states: 'The direct approval of aircraft type training should be done on a case by case basis and should not be granted for long term periods, since it is not a privilege of the organisation providing the training.'	Noted. However, after long discussions it has been decided that only two versions (a and b) for each 148 and 149 Forms can adequately fulfil the scope: a) to be used by the Part-147 organisation; and b) to be used by the competent authority (or, in the case of form 149, as recognition of completion of aircraft type training approved through the direct approval procedure of point 66.B.130).



COMMENT NUMBER	ORGANISATION	Comment	EASA response
193	UK Civil Aviation Authority	Page No: 27, 28, 88 Paragraph No: 3rd table (p27), 1st table (p28), para 2.3 (p88) Comment: We believe the original wording 'Electrical Fundamentals' of the Module 3 title is a better use of language. It is recommended to revert back to the original wording. Justification: Clarity	Accepted.
194	UK Civil Aviation Authority	Page No: 39 Paragraph No: Module 18 Practical Assessment Comment: In general, we agree with the new concept of the Module 18. However, it would be beneficial to give some indication as to what assessment criteria is to be used, who will be performing the assessment and how it will be recorded. Further clarification is required as the guidance seems to be incomplete. It is not clear how many maintenance tasks are to be assessed for a B1/B2/B3 external candidate, whether it is 1, 26 or 1 per each intended competence as defined on the relevant AMC. It is unclear what supporting evidence would be required, e.g. training needs analysis, samples of practical assessment exercises, to be submitted by an MTO when delivering Module 18. It is unclear whether any MTO approved for basic training is also automatically approved to deliver Module 18 without further checks. Further guidance on specific qualification of practical assessors, how will the NAA evaluate the delivery of Module 18, and how long would the applicant be expected to wait to re-try the Module 18 examination if they were to fail, would be beneficial.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
195	UK Civil Aviation Authority	Page No: 39 Paragraph No: 3 Basic training methods Comment: It would be beneficial to state that MBT as a method of training can be used to enhance the training. The combination of physical and virtual training needs further clarification. The risk is that we could see all training being delivered virtually only. This would fall outside the pedagogical doctrines.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
196	UK Civil Aviation Authority	Page No: 39 Paragraph No: GM to Section 1 of Appendix I Comment: The NAA determines a process by which credits from national further education establishments are accepted. It is unclear, however, if this credit could be accepted internationally.	Noted. 66.B.400 encourages exchange of information between NCAs regarding the possibility to accept credit report prepared by another NCA.
197	UK Civil Aviation Authority	Page No: 87 Paragraph No: AMC to Section 3 of Appendix I to Part-66 'Basic training requirements' Comment: Whether it is instructor centred or student-centred training method, the training itself needs to include face to face interaction between both sides. This aspect should be reflected in the AMC rather than leaving it open to interpretation. Further clarification of instructor-centred, student-centred and blended training would be beneficial. It is unclear what alternative provisions used to verify the actual and progressive acquisition of skills and attitude by the student are expected here when Modules 7, 9, 11, 12, 13, 15, 16 and 17 are	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		taught just by the student-centred method. Additionally, the reason for not including Module 14 Propulsion is unclear.	
198	UK Civil Aviation Authority	Page No: 87 Paragraph No: Appendix II — Basic Examination and Assessment Standard (except for category L licence) Comment: The reason for removing Module 9 essay is unclear. There is a strong argument that Module 9 is the most important essay to write as it is all about communication.	Noted. P87 has an error as its mentioned in 2.8 M9.
199	UK Civil Aviation Authority	Page No: 91 Paragraph No: 3. MODULE 18 — Practical assessment Comment: It would be beneficial to define the assessment criteria for the assessors and when and how these assessments take place. It is unclear what methods should be used, e.g. the assessment could include a presentation of course work, a practical task and a focused oral assessment. The oral part could include topics such as health and safety, human factor elements and documentation. The 4th paragraph states: 'After the third failed attempt, an approved skills training is necessary addressing all the criteria of Module 18.' It is unclear what constitutes 'an approved skills training', who is approving it?, whether it should be approved directly by the Competent Authority, should it be delivered by an approved Part 147 Basic Training MTO?, how long should it take? A clearer guidance would eliminate confusion.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
200	UK Civil Aviation Authority	Page No: 91 Paragraph No: AMC to Appendix II — Number of questions per subject Comment: Dictating the maximum number of questions per module is limiting and potentially does not allow for the subject to be fully examined. Additionally, type training is not restricted to a maximum number of questions. Therefore it is unclear why basic training is restricted. Proposed Text: We recommend a more practical solution would be using the following: "a minimum number of questions which cannot be increased by more than 25%".	Noted. The intent is clear: to give a reference for the number of questions for subparagraphs, provided the total number for each module is respected.
201	UK Civil Aviation Authority	Page No: 139 Paragraph No: 18. MODULE 18 — PRACTICAL ASSESSMENT Comment: Guidance is needed as to who, what and where does the assessment take place, how is the event recorded and what are the criteria for re-assessment. Further guidance is also needed as to what qualifications the assessor needs in order to perform these assessments. Perhaps they could be identified within Part 147 MTOE. The tables referred to in the "Duration of the assessment" paragraph seem to be missing, or a reference needs to be included as to where the tables can be found	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
202	UK Civil Aviation Authority	Page No: 143 Paragraph No: 5. Type examination standard for Group 2 and Group 3 aircraft Comment: Please clarify the implications of removing the reference to oral examination	Noted. The type examination consists of practical assessment and oral examination. Only the reference to the written part is removed to avoid confusion with the type training examination.
203	UK Civil Aviation Authority	Page No: 167, 185 and 208 Paragraph No: MODULE 13L. PRACTICAL ASSESSMENT Comment: We suggest consider renaming the practical	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		assessment module to Module 18L. This would make it consistent with Appendix II (for B1, B2 and B3 licences). Otherwise it may be confusing. Justification: Clarity	
204	UK Civil Aviation Authority	Page No: 213 Paragraph No: A. SPECIFIC TASKS FOR AEROPLANES AND HELICOPTERS Comment: Further clarification is required. It is not clear whether the % of completed tasks for OJT for each of the categories of tasks (INS-FOT-R/I-MEL-T/S) that appear at the top of each of the new tables, are the minimum required to complete in order to qualify for those tasks listed in each specific table, or it is the minimum required to complete from the total number of relevant tasks listed in all the tables.	Noted. The percentages showed on table refer to each task category. Examples of OJT so determined are provided as GM.
205	UK Civil Aviation Authority	Page No: 248 Paragraph No: AMC 147.A.115(a) Instructional equipment Comment: The abbreviated term 'CBT' used here for 'computer based training' may be easily confused with the existing official use of the term 'CBT' used for 'Competency Based Training'.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
206	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	The CAA the Netherlands agrees with the intent of this NPA and supports the further processing in order to amend Part-66. We do however have a number of remarks on the amendments.	Noted.
207	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	In the table of GM 66.A.5 Aircraft Groups (page 10) group E category can be added to the B3 license. This does not seem to be in line with the definition of the B3 license. 66.A.3(b) states: "The B3 license is applicable to piston-engine non-pressurised aeroplanes of 2000 kg Maximum Take-off Mass (MTOW) and below. To include group E aircraft the definition needs to be amended.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
208	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	66.A.20(b)(2) (page 11); CAA-NL would like to suggest a deviation from this rule for L-license holders. Similar to what is allowed according to AMC 66.A.30(a) 4. For some license holders within the L category it is difficult to meet the requirement of 6 months experience within the preceding 2 year period. Most of them work on a voluntary basis and mainly in the weekends.	Noted. EASA comprehends the difficulties to fulfil the requirement for L AML holders, nevertheless there are some obligations with ICAO requirements (Annex I 4.2.2.2 (c)). The possibility to revise quickly rule 66.A.20(b) 2 and make it proportionate for L licences will be considered with another RMT.
209	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	AMC 66.A.25 (3) (page 14); In 66.A.25(c) licensing authority is mentioned while in AMC 66.A.25 (3) refers to the competent authority with regards to the practical assessment and the issuance of a Form 148. For clarification purposes it would be better to use the same wording.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
210	Ministry of Infrastructure and Watermanagement,	In 66.A.30 (iv) (page 15) The sentence: "To extend the endorsed category C with respect to other than CMPA to CMPA. "That" should be replaced by "than".	Accepted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
	Aviation Safety Department		
211	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	GM 66.A.30(a) (page 17, third paragraph); This paragraph is unclear as this GM is written for the Cat. C through the academic route only. It also seems to be contradictive with 66.A.30(a) 3 (i) and (ii) where 3 or 5 years experience is required as B1 or B2 staff. The B1 or B2 licenses only exist within the EASA licensing system and not outside this regulatory framework.	Not Accepted. This GM is not written only for Cat. C through academic path.
212	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	66.A.45 (i) (page 18); ELA 1 aeroplanes are part of the subcategory L2 and L2C. How does this relate to the endorsement of group E being limited to ELA 1 aircraft and no requirement for the examination on Module E for L2 and L2C?	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
213	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	GM 66.A.45 table (page 22); Is the ELA1 Group E rating endorsed on the AML when applied for since no examination is required?	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
214	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix I, Module 3 Electrical Fundamentals (page 27); In 3.3 the subject Electrical Terminology is mentioned. This is different from the AMC material where the word Electricity Terminology is used.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
215	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix I, Module 13 (page 71); According to appendix I, 13.7 Flight Controls is divided into a) Aeroplane Flight Controls, b) Rotorcraft Flight Controls and c) System Operation. This subdivision is not visible in the AMC section of Appendix I.	Accepted. AMC revised accordingly.
216	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix III (c)(iv)(page 140); For basic knowledge modules the certificates are valid for 10 years. It is indicated that the limit of 3 years does not apply. What will be the maximum validity for those elements of the theoretical and practical type training and the OJT when used as part of the endorsement of the type in another license (sub) category?	Noted. TT elements and OJT are valid within 3 years before AML application.
217	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix VII, Table of contents (page 162): The sentence: "Module 13L is required only for applicants that do not attend a Part-147 basic training course" seems to be incorrect. For the L-license category a Part-147 basic training course is not a requirement, only Module L examinations are applicable. This would mean that Module 13L is required for all applicants.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
218	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	AMC to Appendix VIII, Module 13L (page 208); Where does this practical assessment needs to be performed? The regulation allows for the basic L modules examinations to be performed by a Part-147 or as agreed by the competent authority for instance an aeroclub. Therefore CAA-NL would like to add the possibility that the practical assessment (module 13L) can also be performed by an aeroclub, as agreed by the competent authority.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
219	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix II, A1 (Page 229); A1 sums up a list of skills related to the duties and responsibilities of B1 or B2 certifying staff. How do these skills need to be assessed? This list also includes a number of skills that someone further develops and learns in the course of their career instead of at the start.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
220	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Appendix II, A2 (i) (page 229); The sentence: "Filter the ATA sub-chapters applicable to the specific aircraft type (add aircraft types if there is any missing). The part "add aircraft types" should be replaced by "add ATA chapters".	Accepted. Text corrected.
221	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	147.A.100(b) (page 245); "Appropriate" is a too wide definition for a classroom - classify for appropriate, for instance a minimum space per square meter per student. This is also in line with normal standards for vocational education in Europe.	Noted.
222	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	147.A.100(j) (page 245); In case of distance learning, the AMC should make clear what the minimum requirements for a suitable learning location are. The Part-147 organisation has no control over the environment where the student is located, however they should require what the conditions for attending a training are and it is the responsibility of the organisation to check the environment to a certain extent during the training.	Noted.
223	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	147.A.105(c) (page 246); Employment of staff is a better instrument to avoid having only training organisations on paper. A Part-147 organisation can easily contract staff without employment and gets an approval based on the contracts available but no hours are actually spend on training at all. The use of contracted instructors is permitted providing the organisation has evidence that without the use of the contractors they can still support the organisation's scope of approval. Invigilators can be hired/contracted.	Noted.
224	Ministry of Infrastructure and Watermanagement,	147.A.105(c) (page 246); The sentence; The maintenance training organisation shall contract with sufficient staff to..... The addition of the word "with" does not make this sentence more clear, on the contrary.	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
	Aviation Safety Department		
225	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	147.A.145(b) (page 249); The sentence; “at the locations identified in the approval certificate and/or at any location...” and/or raises confusion. Better is .. at the locations identified in the approval certificate. Furthermore introduce the temporary location for instance a type training course at customers.	Noted.
226	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	AMC 147.A.145(c)(page 249); Knowledge examinations may also be conducted by accessing the examination questions via uniform resource locator (URL) addresses, provided the knowledge examination environment is under the control of the maintenance training organisation. Prescribe the min. requirements for control such as, but not limited, network security, encryption and use of VPN etc.	Noted. This text is the final output of RMT.0281 ‘New training and teaching technologies’. Refer to CRD to NPA 2014-22.
227	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	AMC 147.A.200(f)(2) (page 250); The sentence “...or 95% completion of the content for student-centred methods in a theoretical training course”. How should this 95% completion of the content be monitored by the training organisation? More guidance on this subject would be helpful.	Noted. This text is the final output of RMT.0281 ‘New training and teaching technologies’. Refer to CRD to NPA 2014-22.
228	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	With regards to article 66.A.10 the CAA-NL would like to see a statement of need to be required with the application. In the Netherlands we see an increasing number of applications for a Part-66 license from people outside of Europe (third countries). Part-66 regulations do not impose any additional requirements on the applicant in article 66.A.10. Every AML application is therefore processed, regardless of country of origin or employer. This has consequences for the subsequent applications such as: The addition of an aircraft type The addition of another category The assessment of the On the job training (OJT), conducted outside of Europe. It is difficult and time consuming to deal with these kind of applications, since we do not know the applicant and the Part-145 organizations where they perform the OJT as they don’t fall under our oversight and we don’t have the capacity to go on-site to all of these countries outside of Europe. Furthermore, we get the impression that these applicants are also “shopping” – meaning that they approach several CAAs in Europe with their inquiries for information and decide then for the “best solution”. Such behaviour is multiplying efforts in all CAAs without any real need. A harmonized approach in Europe for these kind of applications, regulated in Part-66 would be better.	Noted. EASA has not received clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
229	Ministry of Infrastructure and Watermanagement,	Personnel requirements for invigilators seem to be forgotten in this NPA. These persons play an important role within the Part147 organisations during	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
	Aviation Safety Department	examinations; therefore, minimum requirements such as training of procedures needs to be added.	
230	Ministry of Infrastructure and Watermanagement, Aviation Safety Department	Add in the AMC/GM the useful information from the foreign Part 147 Distance learning training method user guide (UG.CAO.00009-003). This concerns virtual classroom, hardware requirements for students and instructors, software requirements, instructor qualifications, student attendance, students training environment, e-library, monitoring of the students progress, number of students, daily training time, impact different time zones, additional tuition hours and/or training method, training schedule difference if any. For examinations – minimum requirements when performed on-line / electronic examination needs to be added and also for practical training and – assessment.	Noted. Guidance to DSL methods will be introduced with RMT.0544 'Review of Part-147'.
231	Part NO.147.0002	Appendix 17.4 Sub Module 7.4, Avionic General Test Equipment, has been removed. This topic is a huge part of the B2 technician workload. The Appendix does not mention use of basic test equipment such as a multimeter. Module 13.8 does mention Types and Use of Avionics general test equipment, but the topic cannot be found in any other submodules of Module 13 e.g 13.4 Com, 13.4 Nav. These sub modules require many learning hours with regards to important relevant test equipment. We believe it would be better to leave module 7.4 as it is in EU no 1321-2014. Avionic Test equipment should remain a vital part of the B2 Maintenance Practices Module 7.7.21Communication is covered in Module M9.7, and we do not think is necessary to have the same subject in Module 7. Appendix 2Overall, we believe there are too many questions from the mechanical based sub modules listed for the B2 examinations in both Module 7, and even more so, in M13. This in turn, results in there being way too few Avionic Systems related questions in the exam.6.3.3: Fabric covering B1 B3. There are 4 MCQ listed. 1 MCQ should be enough. Module 77.6 : Fits and Clearances B2: There are 5 MCQ listed for the Module 7 B2 exam. This is the same as for the B1.1 exam. An appropriate number of b2 MCQ would be 1-2. Modul 1313.2 : Structures(General Concepts) has 8 MCQ listed which we feel is too many. 2-3 MCQ would be more appropriate.13.4 (a) Communication/Navigation There are too few Comm/Nav related questions for the B2 exam. For example, the appendix has almost as many MCQ listed in 13.13 Fuel and 13.14 Hydraulic combined as in 13.4 (a) Communication/Navigation. An appropriate number of Comm/Nav MCQ would be around 40 instead of 24. 13.4 (b) There are too few questions for B2. E.g the appendix has 6 MCQ listed 13.18 Pneumatic/Vacuum that is twice as much questions as in ATC transponder, TCAS, Weather Radar, INS combined (These subjects are comprehensive for B2). Appropriate number of MCQ would be around 15 instead of 3. 13.6 Electronic Emergency Equipment Requirements. 5	Partially accepted. M11, M12 and M13 reorganised. 7.4 was moved for didactical reasons as it makes no sense to talk about avionics test equipment before the systems to be tested have been instructed. Module 7.7.21 Communication is covered in Module M9.7, Module 9 covers communication from a HF point of view. M7.7.21 is the practical application at the workplace when doing reports, T/S and handover or defect rectification write ups. Adding this item was meant to replace the M7 essay question by doing a job-related report or describe the work performed.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		MCQ are too many questions for the relatively small topic of Electronic Emergency Equipment Requirements. An appropriate amount would be 1–2 MCQ.13.8 Instruments The Fuel Quantity Indicating System topic is removed. Although present in M13. 13 Fuel System, we do not think that is sufficient.13.11 Air Conditioning SystemThere are too many questions for this sub module. An appropriate number of MCQ would be around 2 instead of 713.13 Fuel SystemThere are too many questions for this sub module. An appropriate number of MCQ would be around 3 instead of 913.14 Hydraulic SystemThere are too many questions for this sub module. An appropriate number of MCQ would be around 4 instead of 11. 13.15 Ice and Rain protectionThere are too many questions for this sub module. An appropriate number of MCQ would be around 1-2 instead of 6. 13.18 Pneumatic/Vacuum There are too many questions for this sub module. An appropriate number of MCQ would be around 1-2 instead of 6.	
232	Eurowings Technik GmbH	147.A.35(d) :We request to delete this paragraph as the requirements are stated in several other chapters.	Noted.
233	Eurowings Technik GmbH	Regarding paragraph 2.1c): This is well understood, but needs to be clarified: Some member states have apprenticeships of up to 4 years. We request that NAAs receive guidance on how they can establish a procedure for the acceptance of education in order to guarantee a common level. Otherwise, applicants will end up in expensive assessments asking for tasks below their basic skills.It is of the utmost importance that already gained skills do not have to be tested again, to avoid unnecessary costs.In addition to this, a basic skill assessment should not be of a longer duration than an OJT assessment. We also request assessment and related assessment environment guidelines.Regarding paragraph 2.1d): While this is generally accepted, we would like to outline that it never was the intention that all new technologies need to be part of the basic education. New technologies, not yet used in an amount of aircraft where this can be regarded as necessary general knowledge, need to be included in type specific trainings and not in the basic trainings. On the other hand type training demands need to be downsized accordingly. In principle, only the basic contents should be trained in basic training courses, but always state of the art. A mixture with specific type-related contents should be avoided.	Noted.
234	Eurowings Technik GmbH	The structure of Part-66 is generally too complicated and confusing (e.g. Appendix II to AMC to Section 6 of Appendix III to Annex III) and should be simplified to avoid human factor related mistakes.	Noted. However, the scope of RMT.0255 was not to solve this issue.
235	Eurowings Technik GmbH	Regarding table on page 26 (For categories B2 and B2L):We request to delete item "12. AERODYNAMICS, STRUCTURES AND SYSTEMS" for B2/B2L.	Not Accepted. B2 and B2L shall have a minimal knowledge or these subjects.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
236	Eurowings Technik GmbH	AMC to Section 2 of Appendix I to Part-66 — Modularisation Regarding "3. Basic training methods": We request to apply those requirements not only to WBT but also to classroom training, as we see the need to improve this training as well.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
237	Eurowings Technik GmbH	AMC to Section 2 of Appendix I to Part-66 — Modularisation Regarding "MODULE 10. AVIATION LEGISLATION": We request to delete items 10.08, 10.09 und 10.10 as we see no clear relevance for certifying staff.	Not Accepted.
238	Eurowings Technik GmbH	AMC to Section 2 of Appendix I to Part-66 — Modularisation Regarding "MODULE 9. HUMAN FACTORS": We request to delete this content here and to leave it in the human factors training required by Part-145.	Not Accepted. It is not an option as not all P-66 engineers work in a Part-145 environment.
239	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix II — Basic examination and Assessment Standard (except for category L licence) Regarding 1.12(c): We request to delete this item as it increases the applicant's burden. If the exam is passed with 75% in a single sitting, then there is no reason why each part of a partial exam needs to be passed. Especially not when it is unclear if only the partial exam can be re-taken.	Not Accepted.
240	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix II — Basic examination and Assessment Standard (except for category L licence) Regarding 1.13: We request to remove these restrictions at all. If they are not removed, we request clarification: 1. Is the candidate limited to 3 modules per year? 2. What is the procedure after 3 attempts? 3. What happens, if 3 attempts are taken in 13 months?	Not Accepted. 1.13 has been clarified allowing the candidate attempting same exam only 3 times in a 12-month period, forcing the student to study better and avoid attempting a 'lottery win'.
241	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix II — Basic examination and Assessment Standard (except for category L licence) Regarding "2. Number of questions per module": We request to limit the maximum number of questions per module to 100.	Not accepted. As per 1.12. Basic knowledge examinations with a maximum allowed time of more than 90 or more than 180 minutes may be split in two or three partial exams respectively. Each partial exam shall: (a) be complementary to the other partial exam or exams taken by the candidate, ensuring that the combination of partial exams meets the examination requirements for the subject module; (b) be similarly sized; (c) be passed with 75 % or more of the questions answered correctly; (d) have a number of questions that is multiple of four; (e) be listed on the same certificate of recognition that will be issued after the last partial exam has been successfully passed; the certificate of recognition shall list the dates and the results of the partial exams — without averaging the results; (f) be taken within the same organisation, following the normal examination provisions for retaking failed exams.';
242	Eurowings Technik GmbH	AMC to Appendix II — Number of questions per subject Regarding "18. MODULE 18 — PRACTICAL ASSESSMENT": We request to limit the assessment duration to maximum 1 day instead of 5 days.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
243	Eurowings Technik GmbH	66.A.30 Basic experience requirements Regarding paragraph (g): If this applies, we request that the consequences are clearly stated, e.g. reduction of the course duration.	Accepted. Point 147.A.200 (g) modified as follows: '(g) Notwithstanding point (f), in order to benefit from changes in training technologies and methods (theoretical training), or from credits specified in point 66.A.25(e), the number of hours as established in Appendix I (Basic training course duration) may be amended provided that the syllabus content and schedule describe and justify the proposed changes. A procedure shall be included in the MTOE to justify these changes.'
244	Eurowings Technik GmbH	AMC 66.A.30(a) Basic experience requirements Regarding paragraph 2: We request to change the experience requirement to at least 6 month for "B1/B2 candidates" instead of 12 months.	Not Accepted.
245	Eurowings Technik GmbH	66.A.30 Basic experience requirements Regarding paragraph 3: We request to change experience requirements for "B1/B2 candidates" to 6 month and "academic candidates" to 12 month. We also request an overview table instead of the text as the text might lead to various interpretations by NAAs.	Not Accepted.
246	Eurowings Technik GmbH	66.A.30 Basic experience requirements Regarding paragraph 5: This is generally accepted, but we see it as a door opener for interpretations: A "higher educational institution recognized by the NAA" can be close to everything. We will end up in a situation where one member state accepts a training of several months, while another one does not accept years of studying at a university. We request better and clearer guidance from EASA. The requirement for an academic degree should reflect the European degree system (Bachelor/Master).	Only the NCA is able to verify the equivalence between the national system and the requirements of Appendix I.
247	Eurowings Technik GmbH	GM 66.A.30(a) Basic experience requirements Regarding the section "Experience in working in an aircraft maintenance environment [...]": We understand that actually all kind of work in any aircraft maintenance environment will be accepted, if the NAA decides to accept it accordingly. We therefore conclude that this text is not clear enough as often military experience is not fully accepted. We request EASA to come up with more clear text/guidance, which is also more streamlined.	Noted. AMC 66.A.30(e) opens the possibility for the NCA to determine whether the experience accumulated in the military environment can be considered equivalent. It depends on the national level and cannot be decided in one way for all.
248	Eurowings Technik GmbH	66.A.25 Basic competency knowledge requirements Regarding paragraph (g): We consider knowledge of B1 or B2 level as not necessary.	Not Accepted.
249	Eurowings Technik GmbH	66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations Regarding paragraph (c): We highly support the proposed change.	Noted. Unfortunately a major part of the comments is against the mandatory recognition of an already approved OJT. Therefore, the proposal is rejected.
250	Eurowings Technik GmbH	AMC 66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations Regarding paragraph (c): We request to further clarify the term "adequate".	Noted. The procedures by the NCA shall be compliant with the revised and detailed requirement of Section 6 of Appendix III.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
251	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66)Appendix III — Aircraft type training and examination standard — On the job trainingRegarding paragraph 1. (b) (ii):We request that reference to operational suitability data should only be made, if this data is available and easily accessible.	Accepted. 'If available' is specified in the text.
252	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66)Appendix III — Aircraft type training and examination standard — On the job trainingRegarding "3. Aircraft type training standard":When allowing aircraft type trainings with the MBT training method, we request EASA to also include the possibility of distance exams. Please refer to definitions in RMT 281.	Not Accepted. Distance examinations are not allowed.
253	Eurowings Technik GmbH	AMC to Section 6. of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-Job TrainingRegarding paragraph 6.6:We request to delete the requirement for a theoretical part if an aircraft type training is available.	Not Accepted.
254	European Sailplane Manufacturers Association	The technical quality of the NPA regarding the clarity of the proposed changes and the readability is poor.Partially this is not necessarily rooted alone in the NPA drafting but already the very complex and hard to read structure of Part-66 makes any change challenging regarding readability and clarity.Unfortunately the NPA in itself does add to this complexity.We (the European Sailplane Manufacturers) really tried to separate the issues valid for our sector (i.e. all about the L licences) from the many other issues and we suppose the stakeholders from other sectors do the same. This was difficult and not always possible.Therefore it would have been a big step toward clarity to create separate text passages for the different aviation sectors and/or sub-categories of Part-66 licences.The next issue is to print only those passages which have changed out of context, which forces the reader to review in parallel the full Part-66 document as valid today and to compare both texts.This becomes even more tedious when the changed texts contain references which change or are new or when old references disappear due to the changes.As a sidemark, during the drafting process of Part-ML it was really tried with good success to create a rule where readability was improved and minimizing cross-referencing has been done. In direct comparison Part-66 and this NPA2020-12 compare rather poorly.As said above, this is not the "fault" of this NPA alone, but nevertheless it is a pity.	Noted. The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft'; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.
255	European Sailplane Manufacturers Association	The quality of the impact assessment is poor.On page 8 it was stated that"Considering that none of the proposals would have major impacts and/or controversial items, a brief analysis of the main benefits and drawbacks has been included in this section and no detailed impact assessment (IA) has been performed, in accordance with the proportionality principle."As pointed out by our comments with regard to the proposed new introduction of requiring Part-	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>147 organisations towards the issuance of L licences, which is not needed under current rules, we have one example of a proposed change which would really have required a proper impact assessment. Also the touching of items which clearly belong to the range of topics falling under the so called "GA roadmap" without a proper representation of all affected GA stakeholders in the group drafting the NPA would have required a good impact assessment to at least analyse the consequences for the GA community. It is admittedly additional effort to really try to analyse the impact of proposed changes when drafting a NPA, but here is clearly an example where this has been simply more or less disregarded. The choice to ask the stakeholder some questions for feedback within the NPA is appreciated (as is the transparency of the rulemaking process including commenting this NPA) but it would have been nice to see that also during drafting the NPA it would have been tried to see the proposals already with the eyes of stakeholders outside the range of professions and roles as represented in the group.</p>	
256	European Sailplane Manufacturers Association	<p>This NPA does (at least in our opinion) not contain any application of the "better regulation principles". The unfortunately already complex structure of Part-66 is not improved. Changing names and meanings of paragraphs while keeping the original numbers is a sure receipt for confusion now and later during implementation and future work with the changed rule. The sheer volume of data contained in tables, lists, etc. is beyond grasp for any reader. Within the NPA many abbreviations are used but it was not even tried to introduce them (e.g. with a list of abbreviations). When looking to the "Better regulation toolbox" as referenced in the NPA you find: "...How to carry out an impact assessment" &amp; this was just not done "in accordance with the proportionality principle"! ... Identify impacts in impact assessments, evaluations and fitness checks &amp; again, not used, not done... Stakeholder consultation &amp; this is something which could have been done when composing the group, which was not done as clearly not all stakeholders affected are represented; another means would have been a consultation of the group members of the Part-66 changes which had been done before, which was also not done; last but not least a regarding workshop could have been an option (which was also not taken)</p>	<p>Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>However, some other particular topics deserve some dedicated clarifications:</p> <p>Practical Skills Assessment Module:</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p> <p>But following other discussions within the review group (RG) of RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>assessment in the same way it is done for the examination of the basic knowledge modules.</p> <p>OJT In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p> <p>'Recency' requirements for L licences EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p> <p>Request to redefine the privileges of the L1 and L2 in respect of the boundaries between not powered sailplanes, powered sailplanes (self-sustaining, self-launching and touring motor gliders - TMG) and ELA1 aeroplanes. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of the GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.</p> <p>Future RM tasks EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
257	European Sailplane Manufacturers Association	The chapters 2.1. Why we need to amend the rules — issue/rationale and 2.2. What we want to achieve — objectives are clearly based on the Terms of Reference (ToR) for RMT.0255. It is nevertheless noticeable that here changes	<p>Noted. NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>between the ToR and this chapter have been introduced, which are then later in the NPA used to introduce changes to the rules. Example: ToR: "E.g. the opinion of several AMOs is that some maintenance errors can be reduced by improving practical training by means of alternating between theoretical and practical training within the basic training." NPA: "The lack of practical skills of novice maintenance staff. The current rule requires that applicants for an aircraft maintenance licence (AML) should pass the exams without the requirement to attend a regular basic training where practical skills are assessed throughout the training. ..." require that self-trained applicants for the basic AML demonstrate an appropriate level of practical skills; "Here an opinion of "several AMOs" becomes the justification of requiring something for the L licence which during the rulemaking process for the L licence was discussed lengthy and was clearly not required. And it is even correctly described, that the current rules do not require demonstration of the practical skills. And this proposal is even not further looked into by making an impact assessment...?!</p>	<p>difficult to comply with, especially when involving Part-147 organisations and competent authorities. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p>
258	European Sailplane Manufacturers Association	<p>Instead of a full impact assessment, the table on pages 6 and 7 together with the following questions are the only try to assess the consequences of the proposed changes documented in the NPA. It is understandable that the group drafting a NPA does so by consensus which automatically will mean in most cases that this group will consider their proposals to work fine. Therefore it is not surprising that each entry in the last row "Drawbacks" does contain only or upfront something like "no specific drawbacks" or "no major drawbacks". Nevertheless we do disagree with some of the entries: Objective (c) - Add the requirement for the assessment of practical skills. For the L licence this is a BIG deviation from the principle of obtaining the L licence, which was discussed lengthy during the rulemaking process which led to Opinion No 05/2015 and later addition of the L licence to Part-66. "Just" requiring here this additional assessment is a big deviation. Of course we, the European sailplane Manufacturers and certainly any other stakeholder in the gliding community are very much interested to have technical personnel (including of course the L licence holders) to have proper practical skills. But during the rulemaking process leading to Opinion No 05/2015 it was found, that even in national regulations still active at that time where no such assessment was required, the competency of the persons and organisations doing maintenance on sailplanes and other light aircraft was sufficient. All stakeholders in the rulemaking group at that time agreed that the self-interest in the sport and recreational communities is very high to look for proper qualification and that therefore it was deemed fully sufficient to require successful passing of a regarding test alone to obtain the L licence. It is therefore</p>	<p>Noted. NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. But following other discussions within the review group (RG) of the RMT.0255, the Opinion is adjusted to include the possibility for other organisations (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>simply not sufficient to just write into column "Drawbacks" just a little sentence like "Additional burden for applicants without approved training course." Instead it is a fundamental change of the requirements without a ToR and without a proper justification and without an impact assessment. And for the vast number of voluntary staff it means A LOT of additional burden. Objective (e) - Create new 'Group E' in 66.A.5 (for electric propulsion) The way this proposal is written assumes that today no-one could and should do maintenance on aircraft with electric propulsion. This is reflected in the practice of some NAA which even actively prohibit such maintenance of electric driven aircraft despite the fact that such aircraft are in development, production and in use since many years, including aircraft archiving full type certification now some 15 years ago. When the L licence was discussed leading to Opinion No 05/2015 it was already known and accepted that powered sailplanes use some less-conventional propulsion systems beside the typical two- and four-stroke engine. Even at that time, examples were operated with Wankel and jet engines and also with electric propulsion. The philosophy of the group preparing Opinion No 05/2015 was, that the light sport and recreational aviation community will organise itself to get the required experience about maintenance to the user and to the certifying staff. And exactly that is happening since many years. Manufacturers of these aircraft and powerplants conduct training camps for interested persons. With the proposal of NPA2020-12 maintenance of electric driven aircraft would have to be stopped until all according L licence holder get the "E" entry into their licences, which is not helpful. Again, the entry in the "Drawbacks" column does not whatsoever reflect on these realities. The proposal makes things more difficult for the sake of additional paperwork instead of allowing the flexibility which would be needed - a L2 holder should be allowed to work / sign off maintenance on all propulsion systems and he/she should be considered reasonable to do so only after having regarding training / experience, which will certainly not come from the NAAs.</p>	
259	European Sailplane Manufacturers Association	<p>All in all the European Sailplane Manufacturers are rather disappointed with this NPA2020-12. Following the laudable and really appreciated "GA roadmap" phase of EASA rulemaking, this NPA does not compare well with the GA roadmap tasks. In the NPA (just as before the GA roadmap) again issues for large aviation and for sport and recreational aviation are mixed into one. The group composition does not represent the diverse stakeholders within GA, i.e. those in the sport and recreational aviation communities. Some proposed changes are severely affecting our sport and recreational aviation communities without a proper justification and/or impact assessment. The structure and language of the NPA does not improve the already difficult to read Part-66, they make things even worse. It is</p>	<p>Noted.</p> <p>The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>true that Part-66 (at least with regard to the L licence where the European Sailplane Manufacturers have a clear insight and background knowledge) has its shortcomings and indeed we use this commenting of NPA2020-12 also to point out these shortcomings. Under this perspective it is understandably and perhaps even laudable that the group drafting NPA2020-12 also tried to address some issues they saw as missing in current Part-66. Unfortunately the main path taken in NPA2020-12 is then just to ask for more requirements, to make things more complicated and to simply require more than today. This is a real disappointment against the background of the GA roadmap, where the main objective was to get to lighter regulation. That lighter regulation was not aimed for because GA does not need safety. It was aimed for because all (EASA, NAAs, manufacturers, maintainers, operators and all sporting and flying associations, i.e. ALL stakeholders) agreed that in GA the people themselves have a high motivation to do the things right. Not because of thousands of pages of regulations, but because they want to participate in this sector of aviation safe and with joy. It was felt by all parties concerned, that heavy and complicated regulations do not help here but even become a hindrance toward more safety. The NPA2020-12 is not written in this spirit which is very unfortunate.</p>	<p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
260	European Sailplane Manufacturers Association	<p>Regarding OJT the European Sailplane Manufacturers would like to see a clear statement of clarification, that these OJT requirements are not applicable and are not required for the L licence.</p>	<p>Noted.</p> <p>In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.</p>
261	European Sailplane Manufacturers Association	<p>Within 'Objective e' it is discussed whether a "propulsion only" option would be of benefit. The European Sailplane Manufacturers would very much welcome such an option, nevertheless with some changes and amendments: a...today a L2(C) holder could do maintenance on composite sailplanes and powered composite sailplanes. If this person has experience / knowledge on the engine it nevertheless could not do identical (engine only) tasks on a powered sailplane with a different airframe structure (e.g. a wooden or metal aircraft), which makes no sense. b...in many different national licence systems there was a distinction between structure (i.e. the aircraft without the engine) and the propulsion. The current L licence does now make a distinction between powered and non-powered, which requires the holders for the L2 licences to have also the licence for the structure, even when they are "only" engine specialists. This again makes no sense. c...The discussion within the NPA2020-12 is about developing a very specialized sub-rating dedicated on electric propulsion. Whereas it is correct to see electric propulsion different to classic two- and four-stroke engines, it is also correct to see Wankel engines different from those or to see jet sustainer engines as different. If this way is followed, then a multitude of sub-licences would be</p>	<p>Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		required which is not helpful and again makes no sense. Therefore we would applaud an effort to either go to a L-structures and L-engines system or to introduce a L-engine new sub-category. But we would disagree to micromanage the licencing system by introduction of a dedicated electric propulsion sub-category (or then consequently a jet propulsion or Wankel engine sub-category...).	
262	European Sailplane Manufacturers Association	As already written in our comments #259, #256 and #258, we disagree with this very much watered down version of an impact assessment. Cited from our comment # 258: Instead of a full impact assessment, the table on pages 6 and 7 together with the following questions are the only try to assess the consequences of the proposed changes documented in the NPA. It is understandable that the group drafting a NPA does so by consensus which automatically will mean in most cases that this group will consider their proposals to work fine. Therefore it is not surprising that each entry in the last row "Drawbacks" does contain only or upfront something like "no specific drawbacks" or "no major drawbacks". There (in our other comments) we have also included some observations and comments which should be included in an impact assessment and at least mentioned in this table with the "Drawbacks" column, which by design cannot be a full impact assessment but at least offers some overview.	Noted.
263	European Sailplane Manufacturers Association	The European Sailplane Manufacturers would propose to offer at least some of the options for supporting the further development of the proposed changes of this NPA2020-12: ...make a clearer distinction between those changes affecting the GA community and others in the spirit of the GA roadmap...offer a feedback possibility to all affected GA community stakeholders, again in the spirit of the GA roadmap...due to current limitations because of the Covid-19 situation, a classic workshop is certainly not possible, but organizing such an event in an internet-based version could perhaps be useful; if needed with limited participation via representation with those associations already established within the GA roadmap...if possible more direct feedback should be put to the rulemaking group of this task from affected stakeholders which are currently not represented there.	Noted.
264	European Sailplane Manufacturers Association	Changing 66.A.25 from "Basic knowledge requirements" to "Basic competence requirements" is not supported by the European Sailplane Manufacturers. First it is formally not advisable to change the name of the paragraphs regarding their wording but also changing the intent and meaning. The paragraph currently states that some knowledge is required. The proposal develops into a competency requirement which has a different implication. Such a change is creating confusion	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>as until today onother thing has been associated with the paragraph as it will be in the future, which makes updating manuals or other documents a nightmare.Second regarding the intent we completely disagree that training by a Part-147 organisation and demonstration by examination beyond the current scope of tests to obtain the L licence should be requiredThe NPA2020-12 does try to change the intent of the relatively recently introduced L licence by asking for much more with respect to the effort needed to get the L licence.This is not justified in the NPA itself, neither do we see indication in the real life, i.e. the maintenance of sailplanes for this.Instead we still agree with the intent of the L licence as it was introduced, to make access of interested persons to become L licence holders not too difficult because the several thousands of sailplanes in Europe can only be kept airworthi with a relative high number of voluntary staff which simply cannot afford too high effort to get this licence. The training and experience to work on the sailplanes is offered by the gliding associations and in some cases the manufacturers as has been done in the past as well.</p>	
265	European Sailplane Manufacturers Association	<p>The current AMC 66.A.20(b)(2) Privileges is requiring too extensive experience in the light of the fact that in sailplane maintenance a vast number of voluntary staff is performing a very large share of the work.The current specification of the experience, requiring certain number of months or days is simply not adequate to persons working in their flying clubs or associations in maintenance.Ideally, this requirement which is more or less a requirement for a licence renewal "through the backdoor" would be completely dropped for the L licence or at least there must be a better definition fitting to the typical experience which can and should be expected from such voluntary staff members.From the perspective of the European Sailplane Manufacturers the goal should not be to require much in the sense of experience, as the persons participating show a high motivation to learn how to perform the tasks.Instead it would be preferable to allow fast and easy entry into the field of maintenance.The gliding associations and also the manufacturers offer courses to get the needed detail knowledge for maintaining these types of aircraft - this is much more important than to require even more paperwork which has then to be presented to NAA just to extend the licence for another couple of years.The experience already shows that requiring more paperwork (here to extend teh validity of the licence) is in the end dmunishing the time which can be spent to gain experience and to work on the maintenance tasks. This is in the end lessen the level of safety.Hence less complicated rules and less paperwork is what is really required as was expressed very good in the goals of the GA roadmap.</p>	<p>Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
266	European Sailplane Manufacturers Association	The European Sailplane Manufacturers have offered a multitude of comments to this NPA2020-12. Generally, when "L licence" is written in these comments, this typically means the L1 / L2 licences as they are most relevant for sailplanes (of course this includes also the C sub-rating for composite structures). These comments could be applicable also to the L3 and L4 licences in the sense of comments reflecting upon the GA roadmap.	Noted
267	European Sailplane Manufacturers Association	The European Sailplane Manufacturers have experienced already some difficulties with Part-66. Despite the very much appreciated introduction of the L-Licence, the Part-66 has become now more and more hard to work with as this regulation is complicated in structure, has many cross-references and is addressing a too large group of qualifications / licences. In the spirit of the GA roadmap, we would like to see creation of a Part-66L, similarly to the Part-ML. Ideally this would not be totally new rule, but an excerpt of the parts relevant for the L-Licence plus an rulemaking drafting exercise to lighten the rule and to improve readability. If this would lead to a discontinuity between the L-Licence and the "higher" licences and even if this would then lead to less good possibilities for L-Licence holders to upgrade to the higher licences, this would be in our opinion still be preferable to the current rather complex and difficult to understand regulation. Last but not least it would allow some simplifications for the L-Licence as some ICAO requirements might be then not longer needed to comply with to the range of light aircraft as covered by the L-Licence.	Noted. The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft'; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.
268	European Sailplane Manufacturers Association	The European Sailplane Manufacturers were quite surprised to see NPA2020-12 addressing topics about the L-Licence and thereby belonging to the GA roadmap. This surprise was even larger when the group composition for the RMT.0255 / MDM.059 was seen. Contrary to established practice within the tasks of the GA roadmap, this group did not represent the full spectrum of General Aviation stakeholders. This is not surprising as many topics to be addressed under this task are relevant for aviation outside of GA and therefore according group members outside GA are also required. As before the GA roadmap, this then resulted obviously into a real under-representation of parts of the GA stakeholders. Namely in this example of the RMT.0255 group only ECAGAS is here for the GA community. As this association represents the commercial maintenance organisations it is little wonder that e.g. the position of associations with their maintenance organisations working with voluntary staff members / the private owners and operators of aircraft / the manufacturers, which also employ Part-66 personnel and others are not very much represented (if at all) in the NPA. We would suggest to split the proposed changes relevant for the L-Licence into a	Noted. The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft'; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		seperate task or at least to include proper representation of all stakeholders for the coming draftng work and/or workshop(s) before coming to an EASA opinion.	
269	Swedish Transport Agency, Civil Aviation Department	Uncertainty of descriptive recognition of aircraft type, page 34Common tongue in description of Aircraft?	Noted. Corrections and adjustments regarding the use of terms 'helicopter' and/or 'rotorcraft' will be proposed with RMT.0731 'New air mobility' that introduces new aircraft and definitions.
270	Swedish Transport Agency, Civil Aviation Department	Uncertainty of descriptive recognition of aircraft type, page 213Due to uncertainty of descriptive recognition of aircraft: we the SCAA strongly propose that EASA use the same wording for "Helicopters/Rotorcraft" in 1321/2014 Annex 3 (Part-66) Appendix1 (Module 12) as ICAO does in its Annex (8-9?)* regarding the same aircrafts. It is also mentioned in: Appendix II — Aircraft Type Practical Experience and On-the-Job Training — List of Tasks; A. SPECIFIC TASKS FOR AEROPLANES AND HELICOPTERS Tasks are divided in categories of aircraft: aeroplanes and helicopters	Noted. Corrections and adjustments regarding the use of terms 'helicopter' and/or 'rotorcraft' will be proposed with RMT.0731 'New air mobility' that introduces new aircraft and definitions.
271	Swedish Transport Agency, Civil Aviation Department	Possible NAA workload increase due to new criteria's set prior to new AML, page 4 Chapter 2.1 (c)Regarding: The practical assessment of candidates before acquiring the AML. If Part-147 organizations does not wish to carry out new practical assessment Module 18 for external parties & the new theoretical Module E - Electric Propulsion, is it then demanded that each NAA can provide such basic knowledge training/examination if asked for by the market? Will EASA provide a "central-role solution" for these matters of newly introduced module criteria's?	Noted.
272	Swedish Transport Agency, Civil Aviation Department	Possible NAA workload increase due to new criteria's set prior to new AML, page 5 Chapter 2.3 (c)Regarding:The practical assessment of candidates before acquiring the AML. If Part-147 organizations does not wish to carry out new practical assessment Module 18 for external parties & the new theoretical Module E - Electric Propulsion, is it then demanded that each NAA can provide such basic knowledge training/examination if asked for by the market? Will EASA provide a "central-role solution" for these matters of newly introduced module criteria's?	Noted.
273	Swedish Transport Agency, Civil Aviation Department	OJT training mutual recognition, page 6 Chapter 2.4 (a)The NPA states that the TT, approved as per point 66.B.130 'Procedure for the direct approval of aircraft type training', is wished to be recognized everywhere in the EU Member States. Uncertainty of the "actual quality" in OJT training standards due to this mutual recognition, that will emphasize that no additional "check" of the company's OJT-procedures are fulfilled according to the regulation when granting first aircraft type into a new certificate category in the AML may occur, hence we do not approve of the EASA statement: - No specific drawbacks.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
274	Swedish Transport Agency, Civil Aviation Department	Legacy Aircraft – Specific Group, page 6 Chapter 2.4 (a) If Legacy Aircraft ratings shall apply, we strongly suggest a specific “Group 1 ‘legacy aircraft’ complement” to be added in the Appendix I – Aircraft Type Ratings for Part-66 Aircraft Maintenance License’s. - There might be a small risk of confusion with “Legacy Aircraft” and Embraer aircraft called “Legacy” as common designation.	Noted.
275	Swedish Transport Agency, Civil Aviation Department	Risk of less uniformed training content/ standards within the EU. And risk of lack of resources, page 6 Chapter 2.4 (d) When moving some descriptive content of the basic knowledge modules (Syllabus) in Appendix 1 of Part-66 to AMC level, there is an obvious risk of further differences within the set criteria’s for the Part-147 training both regarding in basic training and type training content, due to the possibility of “national changes” and the possibilities of certain new approved methods for training e.g. CBT, MBT, MTD/ MSTD’s. As mentioned in the EASA drawback section; “No major drawbacks. Risk of deviating from the AMC, thus leading to less uniform training content.” - We would really like to highlight the risk of less uniformed training standards. In our opinion, this should be considered as a “major drawback”, it may impact the minimum duration time of training in a negatively manner. - Also, Implementation time needs to be considered as set to “long” so the training organizations have time to implement such a big change in the training content.	Noted. Deviation from an AMC is not an easy and immediate process. The new AltMoC tool introduced in 66.B.2 requires robust justification to propose alternate=equivalent means of compliance.
276	Swedish Transport Agency, Civil Aviation Department	Risk of less uniformed training content/ standards within the EU. And risk of lack of resources, page 150 When moving some descriptive content of the basic knowledge modules (Syllabus) in Appendix 1 of Part-66 to AMC level, there is an obvious risk of further differences within the set criteria’s for the Part-147 training both regarding in basic training and type training content, due to the possibility of “national changes” and the possibilities of certain new approved methods for training e.g. CBT, MBT, MTD/ MSTD’s. As mentioned in the EASA drawback section; “No major drawbacks. Risk of deviating from the AMC, thus leading to less uniform training content.” - - We would really like to highlight the risk of less uniformed training standards. In our opinion, this should be considered as a “major drawback”, it may impact the minimum duration time of training in a negatively manner. - Also, Implementation time needs to be considered as set to “long” so the training organizations have time to implement such a big change in the training content.	Not Accepted. Deviations from AMC will follow the AltMoC process.
277	Swedish Transport Agency, Civil Aviation Department	Category A forgotten in chapter 2.4 (c)?, page 6 Chapter 2.4 (c) Add the requirement for the assessment of practical skills. Add ‘Practical Assessment’ modules in Appendix I (for B1, B2 and B3) and in Appendix VII (for L), required only for applicants without a regular Part-147 basic training. - In the new assessment module #18 it states that category A also is included in the new	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		criteria's for assessment of practical skills with a minimum of 5task to be assessed.	
278	Swedish Transport Agency, Civil Aviation Department	Modernize the content of the syllabus, page 5 Chapter 2.2(d)When updating the syllabus content of Appendix 1 to Annex 3 (Part-66) we would have liked to see the content of "Fuel-tank safety" imbedded to applicable Module(s) for all Category's.	Noted. FTS is currently only applicable to a certain group of aircraft (large aircraft): this is reflected in M7.1, M7.17, M7.20, M11 and M10.10.
279	Swedish Transport Agency, Civil Aviation Department	Modernize the content of the syllabus, page 6 Chapter 2.4 (d)When updating the syllabus content of Appendix 1 to Annex 3 (Part-66) we would have liked to see the content of "Fuel-tank safety" imbedded to applicable Module(s) for all Category's.	See the response to comment No 278 above.
280	Eurowings Technik GmbH	AMC to Section 1 of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-Job Training'We appreciate the possibility of the delta training. Nevertheless, we request that the combined B1+B2 aircraft type training should not expire when one categorie has been completed and endorsed.	Noted. Differences type training between AML categories has been clarified in Appendix III.
281	Eurowings Technik GmbH	AMC to Section 6. of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-Job Training'Regarding "6.4.1 and 6.4.2 General and Personnel requirements": The person to check the OJT for diversity and quantity should not be limited to the assessor. We request to leave the decision to select the responsible person to the maintenance organisation.	Noted. The maintenance organisation appropriately approved has the responsibility to develop and justify the OJT programme and content.
282	Eurowings Technik GmbH	AMC to Section 6. of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-Job Training'Regarding "6.4.3 OJT content":We request to delete following:- "shift-handover procedures and team coordination"- "communication and interaction with flight crew".These parts are specific for each maintenance organisation and should not be part of the OJT.We request to delete also: -"ideally 50 % of the tasks in line maintenance and 50 % of the tasks in base maintenance". Specific tasks are not related to line or base maintenance.	Partially accepted. Nevertheless, a balanced distribution of tasks between line and base maintenance is preferred.
283	Eurowings Technik GmbH	AMC to Section 6. of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-Job Training'Regarding "6.5 Performance of the OJT":We request to limit group tasks not up 3 but up to 6 persons. Experience from previous OJTs shows that a mentor may take care of up to 6 trainees without compromising OJT quality. For complex tasks the training of team work is actually desired.We consider the last section to be overdone. We request to delete it.	Not accepted.
284	Eurowings Technik GmbH	Appendix II — Aircraft Type Practical Experience and On-the-Job Training — List of TasksIn this chapter requirements are stated that also part of the Part-145 initial competence assessment (ICA). We request to avoid this doubling.In any case, if	Not accepted because the OJT and the initial competence assessment could be done in a different Part-145 organisation.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		the OJT assessment and the ICA take place at the same maintenance organisation credit for the ICA should be possible.	
285	Eurowings Technik GmbH	Appendix II — Aircraft Type Practical Experience and On-the-Job Training — List of Tasks Regarding the section "Credit may be given for similar tasks between ATA systems (e.g. pneumatic valves in ATA 21, 30, and 36) but this should be kept to a minimum and shall be approved by the assessor": We request to replace "assessor" by "mentor" here.	Accepted.
286	Eurowings Technik GmbH	Appendix II — Aircraft Type Practical Experience and On-the-Job Training — List of Tasks We request that EASA provide standardized type related OJT content on the basis of maintenance organisation recommendations and which are accepted by all NAAs. This table is not workable and it will not create a standard as there is still no comparison of OJTs possible.	Partially accepted. GM will provide practical examples.
287	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix III — Aircraft type training and examination standard — On the job training Regarding "6.7 Records": As the OJT is provided within Part-145 organisations (not Part-147 organisations), we recommend to directly state the requirement here and not refer to Part-147. As the OJT is carried out in a Part-145 organisation we request to align the record requirements with the existing requirements stated in 145.A.35 (j).	Accepted.
288	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix III — Aircraft type training and examination standard — On the job training Regarding "6.6 Compliance report and OJT certificate": We request to reduce the required OJT documentation to a logbook, an assessment sheet and a timeframe confirmation, which may all be provided electronically.	Accepted. An OJT report is required in point 6. of Appendix III.
289	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix III — Aircraft type training and examination standard — On the job training Regarding "6.5 OJT assessment": We see no need for such a recommendation by the mentor(s) as each task has already been signed.	Not accepted.
290	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix III — Aircraft type training and examination standard — On the job training Regarding "6.3.2 Personnel requirements": We request to delete the item: "The assessor shall not have been involved as a mentor with the candidate in the OJT. If such a condition is unavoidable, an independent observer shall be present during the OJT assessment." There should be confidence in the assessor.	Not accepted. The assessor should not have conflicts of interests.
291	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix III — Aircraft type training and examination standard — On the job training Regarding paragraph "4.1. Theoretical element examination standard": We request that the number of questions should be defined by the Part-147 organisation with regard to the amount of content per submodule.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
292	Eurowings Technik GmbH	AMC to Appendix II — Number of questions per subject We request to delete this table. There is no added value, when the regulator outlines the minimum amount of questions per submodule. This only creates additional work to adapt question databases.	Not accepted. The number of questions for submodules is set at AMC level and respond to a specific request from some stakeholders to have a more standardised examination.
293	Swedish Transport Agency, Civil Aviation Department	Changes of the given course-times. Will there also be an updated course duration Appendix1 to Annex IV (Part-147), considering the changes that will be made when updating the Annex1 (syllabus) of Part-66, or is it still considered to be handled during the current given "minimum-timeframes" as necessary within the e.g. Category B1.1 Basic Training Course with total tuition time of 2400hours.	Noted. The minimum duration figures will not change.
294	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix I — Basic Knowledge and practical assessment Requirements (except for category L licence) Regarding "MODULE 18. PRACTICAL ASSESSMENT": We see a discrepancy when assessment tasks point to aircraft type knowledge as long as general aircraft knowledge is not defined.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
295	Eurowings Technik GmbH	GM 66.A.45 Endorsement with aircraft ratings Regarding coloumn B2/B2L licence "licence subcategory": We request that, for the avoidance of doubt, the text is making clear that in case of a new subcategory, no tasks are required which already are part of the current scope.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
296	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix I — Basic Knowledge and practical assessment Requirements (except for category L licence) Regarding tables beginning with MODULE 1. MATHEMATICS: We request that these tables will be deleted and only clear reference to the appendix is made. This will shorten the text and we do not see a value of tables with headers only. We do not consider it relevant where the tables are placed, as long as they are only outlined once. We understand, that placing only the headers here will give the respective Part-147 organisations and the evaluating NAAs more freedom to adapt to local needs. However, a danger that education levels might differ from country to country is seen as imminent.	Noted.
297	Eurowings Technik GmbH	APPENDICES TO ANNEX III (PART-66) Appendix I — Basic Knowledge and practical assessment Requirements (except for category L licence) Regarding "MODULE 5. DIGITAL TECHNIQUES/ELECTRONIC INSTRUMENT SYSTEMS" and "MODULE 10. AVIATION LEGISLATION": We request to summarize cyber security topics into just one module instead of spreading it over several.	Accepted. Cybersecurity subject kept at general level in M10.
298	Eurowings Technik GmbH	66.A.45 Endorsement with aircraft ratings Regarding paragraph (i): We request clarification why module E is relevant for B1 but not for B2. In our opinion the implementation of a Cat E is to early as only in use for some restricted aircraft. Furthermore, the technology and its application are so limited that we do not see a need for an additional category or respective training. Regarding paragraph (h): As 8 questions correct = 80% (meaning passed) and 7 questions	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		correct = 70% (meaning not passed): a pass mark of 75% is not possible. We request to ask for 12 or 8 questions instead of 10.	
299	Eurowings Technik GmbH	AMC 66.A.30(e) Basic experience requirements We request a definition of acceptable experience (i.e. What kind of tasks? What timeframe? Percentage of time?) We see each NAA handling this topic differently. We therefore request clear guidance instead of a general text only giving room for interpretation.	Noted. The rule cannot be too prescriptive. Each competent authority has the task and the responsibility to determine whether the demonstrated experience is significant or not.
300	Eurowings Technik GmbH	66.A.25 Basic competency knowledge requirements Regarding paragraph (d): We prefer clear guidelines for acceptable credits instead of module 18 and practical assessments.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
301	Eurowings Technik GmbH	66.A.25 Basic competency knowledge requirements Regarding paragraph (b): We request to reduce the amount of references to enhance readability.	Noted. The text of 66.A.25 has been reworded to improve the readability.
302	Eurowings Technik GmbH	66.A.25 Basic competency knowledge requirements Regarding paragraph (a): We request to delete the nomination of NAAs as test providers. We apprehend that otherwise, Part-147 organisations will stop their own exams and forward the students to the NAAs. We doubt that many NAAs are able to provide the required exam questions to examine students in B1, B2, or B3 categories. This will lead to raising education costs and process delays, as carrying out exams is not the key task of the NAA.	Not accepted. NCAs have the possibility to conduct exams.
303	Eurowings Technik GmbH	66.A.25 Basic competency knowledge requirements We request clear criteria and guidelines for competence assessments in soft skills such as attitude and behaviour.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
304	Eurowings Technik GmbH	GM 66.A.5 Aircraft groups Regarding subcategories in general: We demand a more simple and more efficient system with less subcategories. Regarding "FL290": The differences of a pressurized aircraft above FL 290 are mainly due to the need of oxygen systems. Therefore, we request a simplification to pressurized aeroplanes, as handling of oxygen systems might differ from airport to airport (refilling allowed or not) and often national requirements have to be fulfilled as oxygen is seen as dangerous goods in most countries .	Noted. Definition of Group 1 has been changed in order to remove simple small piston engine aircraft. However, RMT.0731 will improve the definition of Group 1 adding conditions for electrical/hybrid aircraft and not conventional aircraft.
305	Eurowings Technik GmbH	66.A.5 Aircraft groups We request to not create additional groups with different nomenclatures (E instead of 6). Instead, we request to integrate new technologies into existing groups.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
306	Eurowings Technik GmbH	GM 66.A.30(a) Basic experience requirements We request EASA to improve/expand the table and to reduce the text.	Accepted. Text removed. Table provides right indication.
307	Eurowings Technik GmbH	AMC 66.A.30(e) Basic experience requirements We doubt that all NAAs are equipped with guidelines that will ensure a common understanding of an equivalent experience. Across member states apprenticeships may last between 6 months and 4 (or 5) years. Some NAAs are accepting and crediting for the 6	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		months education, while others do not recognize the 4 years. We request EASA to elaborate clearer regulations and guidelines having in mind a level playing field throughout the union.	
308	Eurowings Technik GmbH	Regarding paragraph 2.2 (c):In principle, we accept module 18 and the practical assessment. However, we strongly request to adapt the scope, implementation and crediting possibility of existing practical experience.Furthermore, only one practical examination should take place during the training, e.g. through an accreditation of the national vocational training in the individual national member states, so that module 18 can then be omitted if necessary (e.g. in the dual training system in Switzerland/Austria/Germany).Regarding paragraph 2.2 (d): We generally understand und support this item. We would like to add the request to modernize the basic syllabus and to eliminate outdated material and material not necessary for the work as an aircraft engineer. The current syllabus is too much of academic nature than of any use for the scope of an aircraft engineer.	Noted.
309	Eurowings Technik GmbH	ANNEX III (PART-66) The structure of Part-66 is generally too complicated and confusing (e.g. Appendix II to AMC to Section 6 of Appendix III to Annex III). We request a simplification to avoid human factor related mistakes.	Noted, but it is outside the scope of RMT.0255.
310	Eurowings Technik GmbH	Regarding 2.4 paragraph (b):We request EASA to specify the description of the scope and contents of the OJT. It must also be ensured that the recognition of OJT is guaranteed across NAAs.The existing task list does generally apply to all areas of aviation. We request to concrete it for specific areas of application and the to update the contents.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
311	CAA Luxembourg	a) remove the OJT requirements from Part-66 agreed by our stakeholdersb) transpose the OJT requirements from Part-66 into Part-145 under the oragnisation qualification scheme. not agreed.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
312	CAA Luxembourg	2.4 a) Mutual recognition of TT, as approved as per point 66.B.130, we agree on this, this should be recognised everywhere in the EU Member States.b) agreed.c) no opiniond) agreed.e) no opinion	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
313	CAA Luxembourg	agreed	Noted.
314	CAA Luxembourg	<p><b>Page 13:</b> d) The examinations and practical assessments, yes agreed and more clear. g) who is taking care of this examination?</p> <p><b>Page 14:AMC 66.A.25</b> Basic competency requirements. 3. Agreed with the proposal to issue a CoR Form 148.</p> <p><b>Page 15:</b> i, ii, iii &amp; iv agreed, good proposals4. also agreed.5. agreed but question, so military is also ok??</p> <p><b>Page 16</b> (g) agreed but this is creating extra work for the NAA's. Especially for small NAA's higher workload AMC 66.A.30(a) Basic experience requirements.agreed, more clear. GM 66.A.30(a) very good.Page 17very good.</p> <p><b>Page 18 AMC 66.A.30(e)</b> Basic experience requirementsagreed66.A.45 Endorsement with aircraft ratingsno opinion</p> <p><b>Page 18- 21</b> no comments</p> <p><b>Page 22</b> In the case where the On-the-Job Training is required and the licensing competent authority is different from the competent authority of the maintenance organisation, which provides the OJT, the licensing authority shall accept the OJT programme already approved to the organisation (through Chapter 3.15 of the MOE).Yes totally agreed.</p> <p><b>Page 23</b> 66.B.130 agreed66. B.135Agreed but we as an authority need to be properly trained. EASA should deliver this training, for reaching standardisation in the EU member states.for the rest no comments</p>	Noted.
315	FLYING WHALES	PART-66.A.3[...] - CAT A4 Helicopters Piston.- CAT A5 AirshipTurbine ;- CAT A6 Airship Piston.Rationale: The Regulation Part AMC 145.A.30(g) describes a CAT A which is further described in Part 66.A.20(a). Part 66.A.3(a) only lists CAT A for aeroplanes and helicopters (CAT A1-4). However, we also need a CAT A for airships with the same privileges to support the Certifying Staff L5 and B2. One possibility would be to introduce CAT A5 license for Airship Turbine and CAT A6 license for Airship Piston (based on the L5T and L5P).	Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) 'Airships' envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025.
316	FLYING WHALES	PART-66.A.3(f)Category L, divided into the following subcategories:[...] - L5T: gas airships other than ELA2 with turbine engines;- L5P: gas airships other than ELA2 with piston engines.Rationale:Not considering type ratings (i.e. hybrid or full electric propulsion), know-how and knowledge for certifying staff are quite different pending the propulsion. Airship Industry considers then 2 specific licences should be created.	Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) 'Airships' envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025.
317	FLYING WHALES	Appendix VII—Basic knowledge requirements for category L aircraftmaintenance licenceThe definitions of the different levels of knowledge required in this Appendix are the same as those contained in point 1of Appendix I to Annex III (Part-66).[...]L5T: gas airships above other than ELA2 with turbine enginesBasic	Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) 'Airships' envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025.



COMMENT NUMBER	ORGANISATION	Comment	EASA response																																																		
		<p>knowledge requirements for any B1 subcategory plus 8L (only for B1.1 and B1.3), 10L, 11L and part of 12L5P: gas airships other than ELA2 with piston engines Basic knowledge requirements for any B1 subcategory plus part of 8L (only for B1.1 and B1.3), 11L and part of 12L. Rationale: /* Style Definitions */</p> <p>table.MsoNormalTable table.MsoTableGrid A study on the syllabus of Basic knowledge requirements of B1 and L5 licenses has been performed by FLYING WHALES (FLWH) Airship Maintenance Department (AMD) with following outcomes: Although Module 8L provides the training mainly on piston engine, which is covered by B1.2 and B1.4 license Basic knowledge syllabus, but there are still some common submodules with B1.1 and B1.3 license Basic knowledge syllabus (The details of comparison for each submodule is shown in Table 1) Similar to 8L, some submodules in 12L are covered by B1 license Basic knowledge syllabus (The details of comparison for each submodule are shown in Table 1) Module 10L has very limited relevance to 'gas airships above ELA2' maintenance. It focuses more on the gas balloon maintenance. Although some submodules are relevant to gas airship (e.g.: 10L.3 Envelope), but with some redundancies with 11L (e.g.: 11L.3 Envelope) The Table 1 shows training contents extracted from 'Appendix VII to Part-66 – Basic knowledge requirements for category L aircraft maintenance license' with comparison with 'Appendix I to EASA Part-66: 'Basic Knowledge Requirements (except for category L licence)'. The related clauses of Appendix I to EASA Part-66 are attached to Appendix 5.1 at the end of this report.</p> <p>TABLE 1 MODULE 8L</p> <table border="1"> <thead> <tr> <th>POWER PLANT</th> <th>Level</th> <th>Remark</th> <th>8L.1</th> <th>Noise limits</th> </tr> </thead> <tbody> <tr> <td>Explanation of the concept of 'noise level';</td> <td>—</td> <td>Noise certificate;</td> <td>—</td> <td>Enhanced sound proofing;</td> </tr> <tr> <td>Possible reduction of sound emissions.</td> <td>1</td> <td>Covered by Appendix I to Part-66 10.5 (b), 15.7</td> <td>8L.2</td> <td>Piston engines</td> </tr> <tr> <td>Four-stroke spark ignition engine, air-cooled engine, fluid-cooled engine;</td> <td>—</td> <td>Two-stroke engine;</td> <td>—</td> <td>Rotary-piston engine;</td> </tr> <tr> <td>Efficiency and influencing factors (pressure–volume diagram, power curve);</td> <td>—</td> <td>Noise control devices.</td> <td>2</td> <td>Not covered</td> </tr> <tr> <td>8L.3</td> <td>Propeller</td> <td>Blade, spinner, backplate, accumulator pressure, hub;</td> <td>—</td> <td>Operation of propellers;</td> </tr> <tr> <td>Variable-pitch propellers, ground and in-flight adjustable propellers, mechanically, electrically and hydraulically;</td> <td>—</td> <td>Balancing (static, dynamic);</td> <td>—</td> <td>Noise problems</td> </tr> <tr> <td>2</td> <td>Covered by Appendix I to Part-66 15.16, 17A</td> <td>8L.4</td> <td>Engine control devices</td> <td>— Mechanical control devices;</td> </tr> <tr> <td>Electrical control devices;</td> <td>—</td> <td>Tank displays;</td> <td>—</td> <td>Functions, characteristics, typical errors and error indications.</td> </tr> <tr> <td>2</td> <td>Covered by Appendix I to Part-66 15.11</td> <td>8L.5</td> <td>Hosepipes</td> <td></td> </tr> </tbody> </table>	POWER PLANT	Level	Remark	8L.1	Noise limits	Explanation of the concept of 'noise level';	—	Noise certificate;	—	Enhanced sound proofing;	Possible reduction of sound emissions.	1	Covered by Appendix I to Part-66 10.5 (b), 15.7	8L.2	Piston engines	Four-stroke spark ignition engine, air-cooled engine, fluid-cooled engine;	—	Two-stroke engine;	—	Rotary-piston engine;	Efficiency and influencing factors (pressure–volume diagram, power curve);	—	Noise control devices.	2	Not covered	8L.3	Propeller	Blade, spinner, backplate, accumulator pressure, hub;	—	Operation of propellers;	Variable-pitch propellers, ground and in-flight adjustable propellers, mechanically, electrically and hydraulically;	—	Balancing (static, dynamic);	—	Noise problems	2	Covered by Appendix I to Part-66 15.16, 17A	8L.4	Engine control devices	— Mechanical control devices;	Electrical control devices;	—	Tank displays;	—	Functions, characteristics, typical errors and error indications.	2	Covered by Appendix I to Part-66 15.11	8L.5	Hosepipes		
POWER PLANT	Level	Remark	8L.1	Noise limits																																																	
Explanation of the concept of 'noise level';	—	Noise certificate;	—	Enhanced sound proofing;																																																	
Possible reduction of sound emissions.	1	Covered by Appendix I to Part-66 10.5 (b), 15.7	8L.2	Piston engines																																																	
Four-stroke spark ignition engine, air-cooled engine, fluid-cooled engine;	—	Two-stroke engine;	—	Rotary-piston engine;																																																	
Efficiency and influencing factors (pressure–volume diagram, power curve);	—	Noise control devices.	2	Not covered																																																	
8L.3	Propeller	Blade, spinner, backplate, accumulator pressure, hub;	—	Operation of propellers;																																																	
Variable-pitch propellers, ground and in-flight adjustable propellers, mechanically, electrically and hydraulically;	—	Balancing (static, dynamic);	—	Noise problems																																																	
2	Covered by Appendix I to Part-66 15.16, 17A	8L.4	Engine control devices	— Mechanical control devices;																																																	
Electrical control devices;	—	Tank displays;	—	Functions, characteristics, typical errors and error indications.																																																	
2	Covered by Appendix I to Part-66 15.11	8L.5	Hosepipes																																																		



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>— Material and machining of fuel and oil hoses; — Control of life limit.                      2 Covered by Appendix I to Part-66 15.19, 7.9 8L.6</p> <p>Accessories — Operation of magneto ignition; — Control of maintenance limits; — Operation of carburettors; — Maintenance instructions on characteristic features; — Electric fuel pumps; — Operation of propeller controls; — Electrically operated propeller control; — Hydraulically operated propeller control. 2 Partially covered by Appendix I to Part-66 15.22 8L.7 Ignition system — Constructions: coil ignition, magneto ignition, and thyristor ignition; — Efficiency of the ignition and preheat system; — Modules of the ignition and preheat system; — Inspection and testing of a spark plug. 2 Covered by Appendix I to Part-66 15.13 8L.8 Induction and exhaust systems — Operation and assembly; — Silencers and heater installations; — Nacelles and cowlings; — Inspection and test; — CO emission test. 2 Partially covered by Appendix I to Part-66 3.11, 3.18 8L.9 Fuels and lubricants — Fuel characteristics; — Labelling, environmentally friendly storage; — Mineral and synthetic lubricating oils and their parameters: labelling and characteristics, application; — Environmentally friendly storage and proper disposal of used oil. 2 Covered by Appendix I to Part-66 15.11, 15.9, 15.10 8L.10 Documentation — Manufacturer documents for the engine and propeller; — Instructions for Continuing Airworthiness (ICA); — Aircraft Flight Manuals (AFMs) and Aircraft Maintenance Manuals (AMMs); — Time Between Overhaul (TBO); — Airworthiness Directives (ADs), technical notes and service bulletins. 2 Covered by Appendix I to Part-66 10.7 (a) 8L.11 Illustrative material — Cylinder unit with valve; — Carburettor; — High-tension magneto; — Differential-compression tester for cylinders; — Overheated/damaged pistons; — Spark plugs of engines that were operated differently. 2 Not covered 8L.12 Practical experience — Work safety/accident prevention (handling of fuels and lubricants, start-up of engines); — Rigging-engine control rods and Bowden cables; — Setting of no-load speed; — Checking and setting the ignition point; — Operational test of magnetos; — Checking the ignition system; — Testing and cleaning of spark plugs; — Performance of the engine tasks contained in an aeroplane 100-hour/annual inspection; — Cylinder compression test; — Static test and evaluation of the engine run; — Documentation of maintenance work including replacement of components. 2 Partially covered by 7A 8L.13 Gas exchange in internal-</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>combustion engines — Four-stroke reciprocating engine and control units; — Energy losses; — Ignition timing; — Direct flow behaviour of control units; — Wankel engine and control units; — Two-stroke engine and control units; — Scavenging; — Scavenging blower; — Idle range and power range. 2 Not covered 8L.14 Ignition, combustion and carburation — Ignition; — Spark plugs; — Ignition system; — Combustion process; — Normal combustion; — Efficiency and medium pressure; — Engine knock and octane rating; — Combustion chamber shapes; — Fuel/air mix in the carburettor; — Carburettor principle, carburettor equation; — Simple carburettor; — Problems of the simple carburettor and their solutions; — Carburettor models; — Fuel/air mix during injection; — Mechanically controlled injection; — Electronically controlled injection; — Continuous injection; — Carburettor-injection comparison. 2 Not covered 8L.15 Flight instruments in aircraft with injection engines — Special flight instruments (injection engine); — Interpretation of indications in a static test; — Interpretation of indications in flight at various flight levels. 2 Covered by Appendix I to Part-66 5.15,15.14 8L.16 Maintenance of aircraft with injection engines — Documentation, manufacturer documents, etc.; — General maintenance instructions (hourly inspections); — Functional tests; — Ground test run; — Test flight; — Troubleshooting in the event of faults in the injection system and their correction. 2 Not covered 8L.17 Workplace safety and safety provisions Work safety and safety provisions for work on injection systems. 2 Not covered 8L.18 Visual aids: — Carburettor; — Components of injection system; — Aircraft with injection engine; — Tool for work on injection systems. 2 Not covered 8L.19 Electrical propulsion — Energy system, accumulators, installation; — Electrical motor; — Heat, noise and vibration checks; — Testing windings; — Electrical wiring and control systems; — Pylon, extension and retraction systems; — Motor/propeller brake systems; — Motor ventilation systems; — Practical experience of 100-hour/annual inspections. 2 Not covered by the B1 syllabus. However, as many airships still adopt traditional propulsion system, it may not commonly applicable to all airship types. Better to be included in the airship/engine type training 8L.20 Jet propulsion — Engine installation; — Pylon, extension and retraction systems; — Fire protection; — Fuel systems including lubrication; — Engine starting</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>systems, gas assist; — Engine damage assessment; — Engine servicing; — Engine removal / refit and test; — Practical experience of conditional / run time / annual inspections; — Conditional inspections. 2                      Covered by Appendix I to Part-66 15 8L.21 Full authority digital engine control (FADEC) 2 Covered by Appendix I to Part-66 15.11                      MODULE 12L — RADIO COM/ELT/TRANSPONDER/INSTRUMENTS Level                      Remark 12L.1 Radio Com/ELT — Channel spacing; — Basic functional test; — Batteries; — Testing and maintenance requirements 2                      Covered by Appendix I to Part-66 10.5 (b), 11.20 12L.2                      Transponder — Basic operation; — Typical portable configuration including antenna; — Explanation of Modes A, C, S; — Testing and maintenance requirements. 2 Not covered 12L.3                      Instruments — Handheld altimeter/variometers; — Batteries; — Basic functional test. 2 Covered by Appendix I to Part-66 11.5, 11.6                      Therefore, to obtain L5T license from B1.1/1.3, which is only allowed to certify maintenance works on ‘gas airships above ELA2 with turbine engines’, it’s reasonable to exempt: Module 8L, 10L &amp; 12L (if 12L.2 can be merged into 11L)                      While, to obtain L5P license from B1.1/1.3, which is only allowed to certify maintenance works on ‘gas airships above ELA2 with piston engines’, it’s reasonable to exempt: Submodules in 8L and 12L which are covered by B1.1 and B1.3 license Basic knowledge syllabus Module 10L</p>	
318	FLYING WHALES	<p>PART-66.A.3(g)Category CThe C licence is applicable to aeroplanes; and helicopters and large airships.Rationale:Large airship is defined in BIS Airship and referred in AIROPS &amp; Aircrew. The L5 license can be regarded as the same level as B1 license. Some heavy maintenance works for large scale airship will usually involve many maintenance support staff to work together (similar to aircraft C/D check). For such kind of works, C license is more appropriate to manage and release airship into service, like the normal cases for large civil aeroplanes.</p>	<p>Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) ‘Airships’ envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025</p>
319	FLYING WHALES	<p>PART-66.A.30 Basic experience requirements[...]2(b)(i) 2 years of practical maintenance experience in operating aircraft covering a representative cross section of maintenance activities in the corresponding subcategory;(ii) 3 months of practical maintenance experience in operating ‘gas airships other than ELA2’ covering a representative cross section of maintenance activities if this L5 license is granted for a B1 license holder.(iii) as a derogation from point (i), 1 year of practical maintenance experience in operating aircraft covering a representative cross section of maintenance activities in the corresponding subcategory, subject to the introduction of the limitation provided for in point 66.A.45(h)(ii)(3).For the inclusion of an additional subcategory in an existing</p>	<p>Noted. However, the issues related to the licences applicable to the airships will be discussed within the BIS (Best Intervention Strategy) ‘Airships’ envisaged in the EPAS (European Union Aviation Safety Agency) 2023 – 2025</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>L licence, the experience required by points (i) and (ii) shall be 12 and 6 months respectively. The holder of an aircraft maintenance licence in category/subcategory B1.2 or B3 is deemed to meet the basic experience requirements for a licence in subcategories L1C, L1, L2C and L2. Rationale: According to 'Appendix IV — Experience requirements for extending a Part-66 aircraft maintenance license', the basic experience required from B1.1 (Turbine airplane) to B1.3 (Turbine helicopter) is 6 months. This appendix also mentioned that 'The experience requirement will be reduced by 50 % if the applicant has completed an approved Part-147 course relevant to the subcategory.' It means the duration could be 3 months only to extend from B1.1 to B1.3, which has a huge gap comparing with the requirement for extending B1.1 to L5 (2 years).</p> <p>However, there are many differences between airplane and helicopter regarding the maintenance tasks. To highlight those differences, the 'Joint Aircraft System/Component (JASC)' code table is applied, which is a modified version of the 'Air Transport Association of America (ATA), Specification 100 code'. The JASC table is consisted of four-digit numerical codes to represent different systems/components of aircraft. The codes starting with 21 to 85 represent the different sub-systems or components in airframe, propeller/rotor and powerplant systems.</p> <p>The purpose of comparing airplane and helicopter system by system is to determine the level of similarity for these two categories. The higher level of similarity means the less extra experience should be required to extend the relevant maintenance license categories. Since the required Basic experience from B1.1 to B1.3 has been defined, therefore, it's possible to link the similarity with the duration of required basic experience quantitatively. After this relationship has been figured out, it's possible to determine a suitable duration of basic experience from B1.1 to L5 by the same approach, if the similarity between airplane and airship is quantified as well. The calculation is performed in a separated MS Excel document.</p> <p>Regarding the special cases, for example, some systems are not applicable to one or both categories. In case of: The system is not applicable to the former category in the table, the similarity for that item will be assigned with 0%. The system is not applicable to the latter category or the latter category includes all elements inside the former category in the table, the similarity for that item will be assigned with 100%. The system is not applicable to both categories in the table, that item will be excluded from the average similarity calculation.</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Here are some examples of calculation captured from Excel file:</p> <p>Example 1: Transition from B1.1 to B1.3                      For water/waste system, most of helicopters don't have it. Therefore, if a B1.1 engineer would like to add B1.3 category on his/her Part-66 license, he/she doesn't need any extra experience on the maintenance of this system.</p> <p>Example 2: Transition from B1.1 to L5 For the ballonnet, which will be equipped only on the airship, is not applicable to any turbine airplane. Therefore, it's assumed that a B1.1 licensed engineer has no previous experience on the maintenance of ballonnet, and trainings on this system shall be provided for the transition from B1.1 to L5.</p> <p>Example 3: Transition from B1.1 to B1.3 The propeller system could be a common system for both airplane and helicopter. However, the requirement of the maintenance on helicopter's propeller may be stricter due to the failure of one blade may be gained during the transition period. All other cases are shown in the Excel document attached before.</p> <p>Moreover, to make the estimation of required basic experience more precise, the time required to familiarize the maintenance on the 'gas airship above ELA2' specific systems has been estimated. The major practical maintenance on each airship specific system are listed with the associated training time in the bracket: Maintenance practices for 'Nose cone and mooring system'(0.5 week): General visual inspection for the nose probeGeneral visual inspection for the mooring system with the mast head being fully dismantledInspection for mooring system wear (measurements taken) and reassembled every 6 months Maintenance practices for 'Envelope and ballonnet' (1 week): Inspection of the airship envelope Repair of envelope material (fabrics) in case of damages (hole, tear)Maintenance on the gas valvesRepair of ballonnet material in case of damages (hole, tear) From two tables in attached Excel file, it can be found that the similarity between 'Turbine airplane' and 'Turbine helicopter' is 69.76%, which is lower than the one between 'Turbine airplane' and 'Turbine airship': 80.19% (Although the weight of each system item may be different when calculating the overall similarity, but it will not affect the overall result in a great extent). This result shows that there are more maintenance tasks on the airship have been covered by the working scope of B1.1 engineer compared with the tasks on the helicopter. In this case, the required 'Basic experience' for the transition from B1.1 to L5 should even shorter than the transition from B1.1 to B1.3 (3 months if trained by approved Part 147 organization). The estimation of experience required to familiarize the maintenance on airship specific systems is around 1.5 weeks. Therefore, the 3 months can be a reasonable time as Basic experience requirement for extending B1 to L5 license. Moreover, the above</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		approaches have been officially presented to French aviation Authority (OSAC) by FLWH and reached an agreement.	
320	AIRBUS	Airbus supports the Agency's initiative, which aims at reviewing Part-66 in preparation of the future. This preparation will contribute to eliminate concerns that manufacturers may have during the development of aircraft with new propulsion technologies. It is important to make sure the European licensing system is ready well before the introduction into service of such aircraft in order to prevent any discontinuity in the availability of appropriate aircraft-type-rated certifying staff and support staff. The aviation industry cannot afford disruptions of air operations due to the lack of appropriate qualified maintenance personnel. However, Airbus has reservations about the proposed amendments to achieve the objective aiming at providing "suitable solutions as regards the license(s) that are applicable to aircraft with [new propulsion technologies,] without adding complexity to the maintenance licensing system". This NPA does not provide sufficient evidence that the addition of AML subcategories for new propulsion technologies can be avoided without reconsidering the existing scheme that currently aligns with conventional propulsions. One aspect is the consideration given to aircraft equipped with new propulsion technologies: the Form 19 illustrates how it is difficult to quickly identify this kind of aircraft (i.e. no dedicated box). The poor visibility given to such aircraft in the European licensing system may contribute to make the maintenance activity less attractive and by consequence may participate in a shortage of certifying staff and supporting staff for this category of aircraft. A number of Airbus comments seems to indicate that the NPA proposed amendments were not all mature enough to facilitate understanding. Airbus acknowledges that Covid-19 pandemic generated additional difficulties to process in a normal way this long draft, proposing many interrelated changes. It is recommended that (additional) quality gates are put in place to guarantee the robustness of final texts adopted. Some commentators at Airbus expressed their doubts about their ability to identify all potential impacts of their own comments due to the interrelationships between texts (whether proposed for amendment or not).	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
321	AIRBUS	Page 7 of 258, Objective (e): Comment: To have a Module E and a Group E is source of complexity and consequential confusion. Rationale: It gives the impression that: - all aircraft with an electrical propulsion are covered by the Group E (in fact Group 1 includes some) - the module E is necessary to obtain the endorsement of any electrical aircraft type rating on the license (in fact, not necessary to obtain the endorsement of an electrical aircraft type rating of Group	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		1).- the module E will be part of the basic knowledge requirements (look and feel of table inserted in point 66.A.45) while it is not...	
322	AIRBUS	Page 7 of 258, Objective (e):Comment:NPA 2020-12 identifies as a drawback “[...] there is no direct route to apply for an AML for electrical aircraft.However, it is not expected that such needs would arise in the coming years. This will be reviewed when relevant.”In the end, this drawback is a hurdle for the manufacturers developing aircraft using this kind of technology(ies), as it may give the impression to potential applicants that aircraft fitted with this kind of propulsion technologies do not receive the same consideration as for conventional ones.This impression is amplified by the absence of a module for “other than conventional” propulsions in the basic knowledge requirements (Appendix I to Part-66); i.e. “other than conventional” propulsions are not identified as a basic subject for which qualification is necessary for an application for an AML.Rationale:Applicants who want to maintain electrical/hybrid/hydrogen aircraft only, and are not interested in conventional propulsion technologies, should be recognized like other AML candidates.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.
323	AIRBUS	Page 8 of 258, § As regards ‘Objective e’:Comment:The justification given for not retaining the option of a new category of license for Electrical propulsion refers to the assumption of “a niche licence with limited market opportunities for the affected maintenance staff, at least in the short/medium term.”This justification is causing concerns because the regulation may quickly become a hurdle, or worse a showstopper, for the manufacturers developing aircraft using this kind of technology, due to the rulemaking pace and backlog: the scarcity of AML holders will contribute to increase the maintenance costs of such aircraft that will face difficulties to find operators as a result.Experience shows that regulations are not amended at the pace of innovation. That is the reason why technology-neutral requirements are needed as much as possible and in this case, in particular.In order to avoid the “niche” effect and to reduce the dependency on technology, it is proposed to amend point 66.A.3 in order to include subcategories of license covering aircraft with “other than turbine or piston” propulsion technologies.“(a) Category A, divided into the following subcategories:— A1 Aeroplanes Turbine;— A2 Aeroplanes Piston;— Ax Aeroplanes other propulsion technologies— A3 Helicopters Turbine;— A4 Helicopters Piston.;— Ax Helicopters other propulsion technologies(b) Category B1, divided into the following subcategories:— B1.1 Aeroplanes Turbine;— B1.2 Aeroplanes Piston;— B1.x Aeroplanes other propulsion technologies— B1.3 Helicopters Turbine;— B1.4 Helicopters Piston.;— B1.x Helicopters other propulsion technologies(c) Category B2The B2 licence is applicable to all aircraft.(d) Category B2LThe B2L licence is applicable to all aircraft	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>other than those in Group 1 as set out in Point 66.A.5(1) and is divided into the following ‘system ratings’:— communication/navigation (com/nav),— instruments,— autoflight,— surveillance,— airframe systems.A B2L licence shall contain, as a minimum, one system rating.(e) Category B3The B3 licence is applicable to piston other than turbine-engine non-pressurised aeroplanes of 2 000 kg Maximum Take-off Mass (MTOM) and below.(f) Category L, divided into the following subcategories:— L1C: composite sailplanes,— L1: sailplanes,— L2C: composite powered sailplanes and composite ELA1 aeroplanes,— L2: powered sailplanes and ELA1 aeroplanes,— L3H: hot-air balloons,— L3G: gas balloons,— L4H: hot-air airships,— L4G: ELA2 gas airships,— L5: gas airships other than ELA2.(g) Category CThe C licence is applicable to aeroplanes and helicopters.”The Appendix V – Application Form – EASA Form 19 should be amended accordingly.Rationale:Some new technologies other than fossil/bio fuel and electric and hybrid propulsion are anticipated with new projects such as neutral zero-emission commercial aircraft concepts that will use hydrogen as their primary fuel source (look at what is happening in the car industry...).By integrating the future propulsion technologies in the current category of licenses, the regulationassists the propulsion technology transition, instead of creating uncertaintieslimits the number of changes to embark new propulsion technologies.The principle of technology-neutral requirements is in line with the RMT.0731 (New air mobility), where it is expressed that the general principle that future requirements should be technology-neutral where possible.Note: GM 66.A.5 indicates that the module E applies to category B3 license.</p>	
324	AIRBUS	<p>Page 10 of 258; point 66.A.5Comment:Point 66.A.5 refers to the word ‘licence’. The spelling of this word can also be found as ‘license’ in the Part-66.It should be appropriate that the spelling of this word is harmonized through the Part-66.Rationale:In the Part-66 the spelling ‘license’ and ‘licence’ can be found.This might have an impact on the reader, e.g. when a search tool is used to find all occurrences for this term, results are incomplete...</p>	Accepted.
325	AIRBUS	<p>Page 10 of 258; point 66.A.5(1)Comment:(1) Group 1: complex motor-powered aircraft, helicopters, helicopters with multiple engines, [...]Rationale:It is believed that a typo crept into this paragraph as the change (i.e. introduction of “helicopters,”) is not identified in the NPA.</p>	Accepted.
326	CAA Luxembourg	<p>Why do we see here ATA chapters? this is not type training related.training for the NAA's required, see comment before.Table page 160 very clear.</p>	Not accepted. ATA chapters added to make clear reference to aircraft systems.
327	AIRBUS	<p>Page 10 of 258; point 66.A.5(5)andPage 11, GM 66.A.5, last entry of the table (Group E).Comment:[...] with electrical and hybrid propulsion [...]Rationale:Hybrid propulsion is likely to be developed before full electrical propulsion, at least for</p>	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		CMPA.Aircraft with hybrid propulsion should be clearly addressed.RMT.0731 (New air mobility) includes in its first stream of activity requirements for electric and hybrid propulsion.Note: E.g. Appendix I section 2. MODULE 14. PROPULSION table, refers to "(d) Electric and hybrid engines" (ref. page 37 of 258)	favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
328	AIRBUS	Page 10 of 258; point 66.A.5(5)Comment:In order to have the text as technology-neutral text as much as possible, it is proposed to amend AMC 66.A.20(b)(2)2. to read:[...]— Propulsion systems (e.g.: piston, turboprop, turbofan, turboshaft, jet-engine or push propellers); and [...]Rationale: A new Group for aircraft with electrical propulsion is proposed (ref. NPA 2020-12, page 10 of 258, AMC 66.A.20(b)(2) paragraph 2. includes a list of propulsion systems where the electrical one is missing while a new group E (for aircraft with electrical propulsion other than those in Group 1) is created in point 66.A.5.It should be appropriate that this list be non-exhaustive so that this paragraph will not be revised in the case of other future propulsion systems.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
329	CAA Luxembourg	no comments	Noted.
330	CAA Luxembourg	Facility requirements: so the maximum number of students undergoing knowledge training during any training course is not defined anymore?Personnel requirements: very good idea.for the rest no comments.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
331	AIRBUS	Page 10 of 258; GM 66.A.5Comment:Category A license should be deleted from the table of GM 66.A.5.Rationale:Point 66.A.5 is for the purpose of ratings on aircraft maintenance license.Point 66.A.45(a) states stating "For category A, no rating is required, [...]"	Not accepted. AMC&GM will clarify and provide the necessary guidance.
332	AIRBUS	Page 11 of 258; GM 66.A.5Comment: The last entry of the table (for Group E aircraft) should read:Aircraft with electrical propulsion not in Group 1Rationale:To prevent confusion.To be in line with point 66.A.5(5).To be harmonized with the text for Group 4 in this GM.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
333	AIRBUS	Page 11 of 258; point 66.A.20(a). Comment: The text of GM 66.A.20(a)5. should states: The category C licence permit certification of scheduled base maintenance by the issue of a single certificate of release to service for the complete aircraft [...]. Rationale: GM to be in line with the text of the associated IR; i.e. where "scheduled" does not appear. Point 66.A.20(a)7. states:"A category C aircraft maintenance licence shall permit the holder to issue certificates of release to service following base maintenance of the aircraft. [...]"The category C license should permit certification of base maintenance whether scheduled or unscheduled.	Partially accepted. 'Scheduled' is removed.
334	AIRBUS	Page 11 of 258; point 66.A.20Comment:Point 66.A.3(g) should be amended to include two subcategories for category C aircraft maintenance license; i.e.:-	Noted. The entire point 66.A.25 is reworded to better clarify the requirement of basic knowledge and skills.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		Complex motor-powered aircraft- Aircraft other than complex motor-powered aircraft Note: other IR, AMC, GM of Part-66 may be impacted. Rationale: The 2 subcategories for category C license are present in the Part-66:- Appendix V (EASA Form 19) includes two (Sub)categories boxes for license C: One for 'Complex motor-powered aircraft' and another one for "Aircraft other than complex motor-powered aircraft".- NPA page 11 of 258, point 66.A.20 §7 states: " [...] Category C, with respect to complex motor-powered aircraft, includes the privileges of category C with respect to other than complex motor-powered aircraft.- NPA page 16 of 258, GM 66.A.30(a) includes a table summarizing the basic experience requirements for the category C, where the first column is dedicated to 'Category C for CMPA' and the second one to 'Category C for other than CMPA'.	
335	Volocopter	Volocopter welcomes the proposed changes to Part-66 which address new aircraft types as eVTOLs. Due to the timeline of the RMT (Implementing Rule planned for Q3 2023) and the fact that the existing helicopter subcategories of licenses cannot be applied for eVTOLs, there will be a need for an interim solution to authorise licencing staff for such aircrafts.	Noted. The NPA of RMT.0731 'New air mobility' will propose the solution for the licence on electrical aircraft.
336	AIRBUS	Page 11 of 258; point 66.A.25, title. Comment: It is proposed to amend the title to read "66.A.25 Basic competency competence requirements" Note: other IR, AMC, GM of Part-66 may be impacted. Rationale: The definition given in the introductory paragraph of point 66.A.25 seems to correspond better to the definition found in the Collins dictionary for "Competence". "competency in British English (' kɒmpɪtənsɪ) noun Word forms: plural -cies 1. law. capacity to testify in a court of law; eligibility to be sworn 2. a less common word for competence (sense 1), competence (sense 2) Competence in British English (' kɒmpɪtəns) noun 1. the condition of being capable; ability 2. a sufficient income to live on 3. the state of being legally competent or qualified 4. embryology the ability of embryonic tissues to react to external conditions in a way that influences subsequent development 5. linguistics (in transformational grammar) the form of the human language faculty, independent of its psychological embodiment in actual human beings Compare performance (sense 7), langue, parole (sense 5)" Harmonization within Part-66 is preferred: The word 'competence' is used in Part-66 (e.g. Appendix III — Evaluation of the competence: assessment and assessors, paragraph 1).	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
337	AIRBUS	Page 11 of 258; point 66.A.25, introductory paragraph. Comment: It is proposed to limit the evaluation of competence to an examination of the knowledge and a practical assessment of mental and technical skills: "Competency consists of knowledge, practical skills and attitude. The applicant for an aircraft maintenance licence, or for the addition of an aircraft category or subcategory in the aircraft	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>maintenance licence, shall demonstrate by knowledge examination and practical assessment that they meet the competency knowledge and practical skills requirements."Rationale: The notion of "attitude" is not identified as an element of "competence" in the Collins dictionary.No behavioral requirements are defined in appendixes I and VII of Part-66.Examination and assessment standards provided in appendixes II and VIII of Part-66, do not contain criteria for attitude evaluation: "For the purpose of the practical assessment, the competencies to be assessed" being Mental and Technical "skills", without reference to attitude.The attitude of an applicant during examination might not be representative of his/her real personality. This may take two different ways:The applicant is well prepared for the test but could behave not as expected in real conditionThe applicant may not show expected behaviors during training/test but can demonstrate adequate knowledge and manual skills.The attitude of an individual may evolve and/or change during his/her life. Should an AML holder having an inappropriate behavior in maintenance be authorized to certify maintenance?Therefore, should the attitude be a criteria for obtaining/keeping a maintenance certification authorization, but not a criteria for obtaining an AML?For category C license, the competence does not include manual skills and attitude; because there is no practical assessment.Attitude of applicant might be difficult (almost impossible) in case of virtual environment i.e.: distance learning / online tests.Evaluation is different depending on the nature of the competence; an examination for the applicant's knowledge and an assessment of its practical skills.Note: point 66.A.25(c) requires "practical assessment" for demonstration of "adequate skills".</p>	
338	AIRBUS	<p>Page 11 of 258; point 66.A.25Comment: It is proposed to amend the text of the introductory paragraph to read:"[...] The applicant for an aircraft maintenance licence, or for the addition of an aircraft category or subcategory in the aircraft maintenance licence, shall demonstrate by examination [...]"Rationale:No aircraft categories are defined in Part-66. The category relates to the license categories described in point 66.A.3.</p>	<p>Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.</p>
339	AIRBUS	<p>Page 11 of 258; point 66.A.25Comment:It is proposed to amend the text of the introductory paragraph to read:"[...] The applicant for an aircraft maintenance licence, [...] shall demonstrate by [...] that they the applicant meets the [...] requirements."Rationale:To ease understanding.</p>	<p>Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.</p>
340	AIRBUS	<p>Page 11 &amp; 13 of 258; point 66.A.25Comment:It is proposed to transfer element from paragraph (c) to the introductory paragraph as follow:Introductory paragraph of point 66.A.25:"[...] The applicant [...] shall demonstrate by examination and, except for the category C license, practical assessment that</p>	<p>Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		[...]”Point 66.A.25(c):“(c) [...]The practical assessment is not required for category C licences.”Rationale: The introductory paragraph should defines primarily objective/common requirements for all categories of licenses. As no practical assessment is expected for applicant to category C license, it should be stipulated in this introductory paragraph rather than in sub-paragraph (c).The proposed wording is similar to the wording used in Regulation (EU) No 1321/2014 (e.g. point 145.A.35(b)).	
341	AIRBUS	Page 12 of 258; point 66.A.25(a)Comment:It is proposed to amend the paragraph (a) to read:“(a) The applicant shall demonstrate by examination a level of knowledge that is appropriate to the related subject modules in accordance with [...]”Rationale:There is no need to remind that the level of knowledge is subject to examination as it is already specified in the introductory sentence of point 66.A.25.	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
342	AIRBUS	Page 12 of 258; point 66.A.25(a)Page 12 and 13 of 258, point 66.A.25(c)Comment:For sake of simplification, it is proposed to amend the paragraph (a) to read:“(a) The applicant shall demonstrate [...] a level of knowledge and practical skills that is appropriate to the related subject modules in accordance with Appendix I [...] or Appendix VII [...]”And to delete paragraph (c)“(c) In addition to demonstrating the appropriate level of knowledge, applicants that do not attend a regular Part-147 basic training course shall demonstrate they have the adequate skills, in the subcategory or system rating applied for, through a practical assessment carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority.The practical assessment shall comply with the standard set out either in Module 18 of Appendix II (for B1, B2 and B3 licences) or in Module 13L of Appendix VIII (for L licences) to Annex III (Part-66). The practical assessment is not required for category C licences.”Rationale:Appendixes I and VII include both knowledge modules and a practical (skills) module.The mutualisation of paragraphs (a) and (c) simplifies the understanding of requirements common to both knowledge and practical skills.Note: Some comments on the contents of paragraph (c):- it states “[...] attend a regular Part-147 basic training course [...]”, while Appendixes I and VII refer to “[...] attend a full Part-147 basic training course.” It would be appropriate to align both wordings or explain the difference between “regular” and “full”.- it refers to “licensing authorities” while it should refer to “competent authority” (refer to point 66.1).- the possibility that the practical assessment is performed by “another organization as agreed by the competent authority for an aircraft maintenance license in category L within a given subcategory” should be kept like in paragraph (a).	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
343	AIRBUS	Page 12 of 258; point 66.A.25(a)Comment:It is proposed to amend the paragraph (a) of point 66.A.25 to read:“[...] in accordance with Appendix I (applicable to A, B1, B2, B2L, and B3 and C licences) or Appendix VII (applicable to L licences) to Annex III (Part-66).[...] set out in Appendix II (applicable to A, B1, B2, B2L, and B3 and C licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by: [...].”Rationale: All categories of licenses as listed in point 66.A.3 must be reflected (except category L licenses that are appropriately addressed).	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
344	AIRBUS	Page 12 of 258; point 66.A.25(a)Comment:It is proposed to move the competence evaluation dedicated text away from paragraph (a):“The examination shall comply with the standard set out in Appendix II (applicable to B1, B2 and B3 licences) or Appendix VIII (applicable to L licences) to Annex III (Part-66) and shall be conducted either by:(i) a training organisation that is appropriately approved in accordance with Annex IV (Part-147); or (ii) a competent authority; or (iii) another organisation as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory.”And to transfer it to a dedicated new paragraph of point 66.A.25.Rationale:The intent of the proposed change is to keep paragraph (a) for knowledge and skills “requirements” only, and to create a new one for examination standard.	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
345	AIRBUS	Page 12 of 258; point 66.A.25(a)Comment:It is proposed to amend point 66.A.25 to read:“The evaluation of the applicant, encompassing knowledge examination and practical assessment, shall comply with the standard set out in [...]”Rationale:“Examination” seems to refer to the knowledge evaluation only, as “assessment” is used for practical skills evaluation. As both knowledge and practical skills are to be evaluated, (e.g.: ref. to point 66.A.25 introductory paragraph, and Part-66 appendixes), a clarification is necessary to avoid misinterpretation.For simplification of the remainder of the Part-66, it may be appropriate to use a common term covering “examination” and “assessment”. We propose the term “evaluation”.Note: This remark may be applied to other locations such as for appendixes II and VIII titles.	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
346	AIRBUS	Page 12 of 258; point 66.A.25(a)(ii)Comment:It is proposed to amend point 66.A.25 to read:“(ii) a the competent authority; or”Rationale: The competent authority is defined in point 66.1. There is only one for a considered case.	Accepted.
347	AIRBUS	Page 12 of 258; point 66.A.25(b)Page 160 and 161 of 258, Appendix IV section B. table Comment:It is proposed to delete paragraph (b) and to transfer the contents of Appendix IV section B into a new AMC to Appendix I and Appendix VII.Note: the title of Appendix IV should be amended to read:“Experience and basic knowledge	Partially accepted. Appendix IV applies only to the extension of AML (sub)categories.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		modules requirements for extending a Part-66 [...]”to be aligned with the above change proposal.Rationale: The introductory paragraph of point 66.A.25 covers “the applicant for an aircraft maintenance licence, or for the addition of [...] category or subcategory in the aircraft maintenance licence, [...]”.The paragraph (a), referring to “the applicant”, applies to both cases i.e. for new license and for license extension.The first sub-paragraph of paragraph (b) duplicates paragraph (a) requirements.For sake of clarity and simplification, it would be appropriate to delete the first sub-paragraph of paragraph (b).The second subparagraph of paragraph (b) does not include any requirement, but information (by reference to Appendix IV) on how a holder of an aircraft maintenance license may achieve the requirements of point 66.A.25(a).It is therefore proposed to transfer the contents of Appendix IV (i.e. the section B) into an AMC to Appendix I and Appendix VII.	
348	AIRBUS	Page 13 of 258; point 66.A.25(d)Comment:It is proposed to amend paragraph (d) to read:“(d) The knowledge examinations and practical assessments shall have been passed within 10 years prior to the application for [...]”Rationale: The term “assessment” is clearly associated with the practical skills evaluation, similarly the term “examination” should be explicitly associated with the knowledge evaluation.	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. Reference to the assessment of the practical skills is removed because EASA decided to not propose this requirement.
349	AIRBUS	Page 13 of 258; point 66.A.25(d)Comment:It is proposed to amend paragraph (d) to read:“[...] If this does not apply By derogation, examination credits may be obtained in accordance with point (e).”Rationale: Harmonization with traditional wording used in Part-66; e.g. Point 66.A.45(d).	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency.
350	AIRBUS	Page 13 of 258; point 66.A.25(d)Comment:It is proposed to amend paragraph (d) to read:“[...], examination and assessments credits may be obtained in accordance with point (e).”Rationale: As “examination” relates to knowledge, “assessment” should be added to cover practical skills credits.(ref. point 66.A.25(e)(i)).	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
351	AIRBUS	Page 13 of 258; point 66.A.25(e)Comment:It is proposed to amend paragraph (e) to read:“(e) The applicant may apply to the competent authority for full or partial credits for the basic knowledge and practical skills requirements for: [...]”Rationale:To avoid the repetition of “basic” knowledge in the introductory sentence of paragraph (e) and item (i).As detailed in item (i), credits apply to both knowledge examination and practical assessment.	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
352	AIRBUS	Page 13 of 258; point 66.A.25(e)Comment:It is proposed to amend paragraph (e) to read:“[...] requirements for:(i) basic knowledge examinations and practical assessment passed more than 10 years before the application (see point (d));(ii) any other national technical training, knowledge examination or practical assessment considered by the competent authority in order [...]. The applicant shall provide evidence of the granted credits or refer to an examination or	Noted. The entire text of 66.A.25 has been rephrased for the sake of clarity and consistency. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		assessment credit report approved by [...].”Rationale:For sake of consistency, it is proposed to keep in the item (ii) the same wording as in item (i).As “examination” relates to knowledge, “assessment” should be added to cover practical skills credits.(ref. point 66.A.25(e)(i)).	
353	AIRBUS	Page 13 of 258; point 66.A.25(e)And similarly in this NPA:Page 12 of 258; point 66.A.25(c)Page 18 of 258; AMC 66.A.30(e) 1.Page 22 of 258; point 66.B.115(c)Comment:It is proposed to amend paragraph (e) to read: “[...] credit report approved by the licensing competent authority in accordance with Subpart E of Section B of Annex III (Part-66).”Note: IR, AMC, GM of Part-66 may be impacted at other locations.Rationale:For sake of consistency, reference should be made to “competent authority” (refer to point 66.1).The use of “licensing” authority and “competent” authority for designating the same authority might be confusing for the reader.	Accepted. ‘Competent’ kept in the place of ‘licensing’ authority.
354	AIRBUS	Page 13 of 258; point 66.A.25(g) Page 25 to 39 of 258; Appendix I (section 2.) Page 39 of 258; GM to Section 1 of Appendix I Page 40 to 82 of 258; AMC to Section 2 of Appendix I to Part-66 — Modularisation Page 88 to 91 of 258; Appendix II (section 2.) Page 91 to 138 of 258; AMC to Appendix II — Number of questions per subject Comment:It is proposed that the levels of knowledge and the examination details for category C license are defined as for the other category of AMLs. To achieve it, it is proposed:- to delete paragraph (g) of point 66.A.25, and- to amend Appendix I section 2. and AMC to Section 2 of Appendix I to explicitly indicate the required level for Category C licenses for each Modules, and to delete GM to Section 1 of Appendix I- to amend Appendix II section 2. and AMC to Appendix II to explicitly indicate the examination details for category C license.Note: In case of different competence requirements for category C license for CMPA and other than CMPA, it should be specified.Rationale:For sake of clarity and harmonization between AMLs through the Part-66.	Noted. Training Levels for Cat. C are now specified in point (g) of 66.25. Required Modules for Cat. C are now listed in Appendix II in relation to the B1/B2 path selected.
354	AIRBUS	Page 13 of 258; point 66.A.25(g)Page 25 to 39 of 258; Appendix I (section 2.)Page 39 of 258; GM to Section 1 of Appendix IPage 40 to 82 of 258; AMC to Section 2 of Appendix I to Part-66 — ModularisationPage 88 to 91 of 258; Appendix II (section 2.)Page 91 to 138 of 258; AMC to Appendix II — Number of questions per subjectComment:It is proposed that the levels of knowledge and the examination details for category C license are defined as for the other category of AMLs. To achieve it, it is proposed:- to delete paragraph (g) of point 66.A.25, and- to amend Appendix I section 2. and AMC to Section 2 of Appendix I to explicitly indicate the required level for Category C licenses for each Modules, and to delete GM to	Noted. Training Levels for Cat. C are now specified in point (g) of 66.25. Required Modules for Cat. C are now listed in Appendix II in relation to the B1/B2 path selected.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		Section 1 of Appendix I- to amend Appendix II section 2. and AMC to Appendix II to explicitly indicate the examination details for category C license.Note: In case of different competence requirements for category C license for CMPA and other than CMPA, it should be specified.Rationale:For sake of clarity and harmonization between AMLs through the Part-66.	
355	AIRBUS	Page 14 of 258; AMC 66.A.25 §3.Comment:It is proposed to amend the AMC 66.A.25 §3 to read:“3. The successful accomplishment of the practical assessment should be demonstrated by a certificate of recognition (CoR) (EASA Form 148) of Appendix III to Annex IV (Part-147) issued by an approved Part-147 organisation, or by the competent authority, or another organization as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory.”Rationale:As per point 66.A.25(a)(iii), the practical assessment can be performed by “another organization as agreed by the competent authority for an aircraft maintenance licence in category L within a given subcategory”.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
356	AIRBUS	Page 14 of 258; GM 66.A.25(b).Comment:It is proposed to delete this GM.Rationale: The content of GM 66.A.25(b) is now introduced in point 66.A.25(a)(iii).	Accepted.
357	DE.147.0018	The basis of my comments are the planned innovations, especially with regard to drive technologies. They continue to refer primarily to general aviation aircraft, but not only to these. 1. To me, the development of a module E, without any differentiation in terms of content, also with regard to the levels of difficulty in the various categories, is only conditionally effective. 2. Module E also seems to be relevant for CAT A-training (NPA, page 11 above) Why is category CAT A not found under 66.A.45 (NPA, page 19 above)? 3. Why is the opportunity not used to create a basic training course for pure electric aircraft up to 2000kg MTOM (CAT B3E) and one for aircraft heavier than 2000kg MTOM (B1E)? 4. Is the development of the hydrogen / fuel cell / electric drive given the necessary attention for the future and taken into account in the revision? Many developers are working on it (e.g. Airbus with the ZEROe project and many others). Where can I find the development in the NPA again? I strongly suggest this should be considered. 5. Wouldn't it be forward-looking and at the same time a reflection of the existing conditions if the increasing use of composites were to be included more in the basic training (M6; M7; M11)? 6. Adhesive processes are becoming more and more important in aviation. Shouldn't that be taken into account accordingly?7. Where is the competence orientation and the key competences of the EU taken into account in basic training (at least the "mathematical competence and basic scientific-technical competence" and the "learning competence")? Competence orientation should play a central role in all training	Noted. The intent is to provide the general terms of content but not on a nano level; this section needs to cover all new technologies once they are commonly available and widely introduced. Type training is the place to train this. To widely introduce new content before they become common and general need would 'overload' the Basic Training programme (as it is already too long).



COMMENT NUMBER	ORGANISATION	Comment	EASA response
358	DE.147.0018	<p>The basis of my comments are the planned innovations, especially with regard to drive technologies. They continue to refer primarily to general aviation aircraft, but not only to these.</p> <ol style="list-style-type: none"> <li>To me, the development of a module E, without any differentiation in terms of content, also with regard to the levels of difficulty in the various categories, is only conditionally effective.</li> <li>Module E also seems to be relevant for CAT A-training (NPA, page 11 above) Why is category CAT A not found under 66.A.45 (NPA, page 19 above)?</li> <li>Why is the opportunity not used to create a basic training course for pure electric aircraft up to 2000kg MTOM (CAT B3E) and one for aircraft heavier than 2000kg MTOM (B1E)?</li> <li>Is the development of the hydrogen / fuel cell / electric drive given the necessary attention for the future and taken into account in the revision? Many developers are working on it (e.g. Airbus with the ZEROe project and many others). Where can I find the development in the NPA again? I strongly suggest this should be considered.</li> <li>Wouldn't it be forward-looking and at the same time a reflection of the existing conditions if the increasing use of composites were to be included more in the basic training (M6; M7; M11)?</li> <li>Adhesive processes are becoming more and more important in aviation. Shouldn't that be taken into account accordingly?</li> <li>Where is the competence orientation and the key competences of the EU taken into account in basic training (at least the "mathematical competence and basic scientific-technical competence" and the "learning competence")? Competence orientation should play a central role in all training</li> </ol>	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
359	AIRBUS	<p>Page 15 of 258; point 66.A.30(a)3. and 4. Page 158 and 159 of 258; Appendix IV Comment: It is proposed to transfer the contents: from point 66.A.30(a)3. subparagraphs (i), (ii) and (iv)(1) and point 66.A.(a)4.(i) to Appendix VI in (and in particular adding required rows and columns to the table A of for category C licenses, both CMPA and non-CMPA). Rationale: Point 66.A.30(b) dedicated to the experience requirement for extension of existing license should be used for category C license since the Category C license is in addition to an existing aircraft maintenance license. It should be treated in the same manner as for the other AML categories. Note: Point 66.A.30(b) does not exclude category C license. Point 66.A.30(b) refers to Appendix IV of Annex III defining the experience requirements appropriate to the additional category or subcategory of license applied for. Appendix IV of Annex III should be amended to include category C license in table A. Note: In case of invalid license, can past experience be claimed</p>	Not accepted. Tables of Appendix VI would be too heavy to understand.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		and for how long? This question should be answered if point 66.A.30(a)3. subparagraphs (i), (ii) and (iv)(1) and point 66.A.(a)4.(i) are not for license extension only.	
359	AIRBUS	Page 15 of 258; point 66.A.30(a)3. and 4. Page 158 and 159 of 258; Appendix IV Comment: It is proposed to transfer the contents: from point 66.A.30(a)3. subparagraphs (i), (ii) and (iv)(1) and point 66.A.(a)4.(i) to Appendix VI in (and in particular adding required rows and columns to the table A of for category C licenses, both CMPA and non-CMPA). Rationale: Point 66.A.30(b) dedicated to the experience requirement for extension of existing license should be used for category C license since the Category C license is in addition to an existing aircraft maintenance license. It should be treated in the same manner as for the other AML categories. Note: Point 66.A.30(b) does not exclude category C license. Point 66.A.30(b) refers to Appendix IV of Annex III defining the experience requirements appropriate to the additional category or subcategory of license applied for. Appendix IV of Annex III should be amended to include category C license in table A. Note: In case of invalid license, can past experience be claimed and for how long? This question should be answered if point 66.A.30(a)3. subparagraphs (i), (ii) and (iv)(1) and point 66.A.(a)4.(i) are not for license extension only.	Noted. Tables of Appendix IV now establish the BK modules and experience necessary to extend AML subcategories.
360	AIRBUS	Page 16 of 258; point 66.A.30(g) Comment: It is proposed to amend point 66.A.30(g) to read: [...] when Modules 1 and 2 are demonstrated by examination or are credited by a the competent authority takes credit for. Rationale: For sake of clarity, reference is made to "the" competent authority as defined in point 66.A.1. There is only one for a considered case.	Accepted.
361	AIRBUS	Page 16 of 258; AMC 66.A.30(a) §2. Comment: It is proposed to transfer the contents of paragraph 2. of AMC 66.A.30(a) to a new AMC to Appendix IV. Rationale: Point 66.A.30 is about "basic experience requirements" and Appendix IV is about "experience requirements for extending a Part-66 aircraft maintenance licence". As AMC 66.A.30(a) paragraph 2. Clarifies "[...] at least 12 months of the required experience should be gained [...] as B1 or B2 support staff." This means that the applicant is already holding a part-66 license. Therefore this information is more relevant for Appendix IV.	Not accepted. It is quite difficult to clarify the experience requirement for Cat. C and summarise it in the table of Appendix IV.
362	AIRBUS	Page 16 and 17 of 258; GM 66.A.30(a) Comment: It is proposed to transfer the contents of GM 66.A.30(a) to a new GM to Appendix IV when related to extension of existing license. Rationale: Point 66.A.30 is about "basic experience requirements" and Appendix IV is about "experience requirements for extending a Part-66 aircraft maintenance licence". The proposed GM 66.A.30(a) provides	Not accepted. It is quite difficult to clarify the experience requirement for Cat. C and summarise it in the table of Appendix IV.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		some past experience requirements gained as AML holder for Category C license extension. Therefore this information is more relevant for Appendix IV.	
363	AIRBUS	Page 18 of 258; AMC 66.A.30(e) §1. Comment: It is proposed to amend the paragraph 1. of AMC 66.A.30(e) to read: "If the licensing authority has established that the experience gained outside an aircraft maintenance organisation that is approved in accordance with Part-145 or Part-CAO is equivalent to that required by Part-66, the minimum additional experience in aircraft maintenance organisation(s) that is (are) approved in accordance with Part-145 or Part-CAO should be: [...]" Rationale: For sake of simplicity it is proposed to eliminate an unnecessary duplication (i.e. already addressed in 1st sentence of point 66.A.30(e)).	Accepted.
364	AIRBUS	Page 18 of 258; point 66.A.45(i). Page 19 of 258, point 66.A.45(i)(a)(g). Comment: It is proposed to amend point 66.A.45(i) to read: "The endorsement is limited to the corresponding aircraft category type rating (e.g. electrical aeroplanes for B1.1, B1.2 and B3)." Similar comments apply to point 66.A.45(i)(a)(g). Rationale: Aircraft category is not defined whereas license category and aircraft type rating are.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
365	AIRBUS	Page 18 of 258; point 66.A.45(i). Comment: Point 66.A.45(i) states: "[...] The examination on Module E is not required for category L2 and L2C. For these categories, the endorsement of Group E aircraft is limited to ELA1 aircraft. [...] The examination on Module E is not required for categories B2 and B2L. [...]" The Agency should clarify the reasons why categories B2, B2L, L2 and L2C are exempted from examination on module E. Rationale: Point 66.A.25 states "The applicant for an aircraft maintenance licence, [...], shall demonstrate by examination [...] that they meet the competency requirements." This point does not include any examination exemption for categories B2, B2L, L2 and L2C licenses.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
366	AIRBUS	Page 18 and 19 of 258; point 66.A.45(i)(a). Comment: The required levels of knowledge should be specified for category L5 licenses. Rationale: GM 66.A.5 includes a table where Group E aircraft is applicable to category L5 licenses.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
367	AIRBUS	Page 25 of 258; Appendix I Page 162 of 258, Appendix VII Comment: It is proposed to amend the title of Appendix I and VII to read: "[...] Basic knowledge and practical skills assessment requirements [...]" Rationale: Appendixes I and VII detail the required competences, but not their evaluation.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
368	AIRBUS	Page 25 and 26 of 258; Appendix I Page 162 of 258, Appendix VII Comment: The Modularisation table does not include a module for propulsion technologies other than conventional ones. Such a module should be added. Rationale: This is a hurdle for the manufacturers developing aircraft using new propulsion technology(ies),	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		as it may give the impression to potential applicants that such aircraft do not receive the same consideration as for conventional ones.	
369	AIRBUS	Page 25 of 258; Appendix I. Comment: It is proposed that the first matrix table of section 2. of Appendix I is amended to indicate with an 'X' the modules (from 11 to 17) that are applicable to category C License. Rationale: For category C license the applicability of the subject modules 11 to 17 are indicated as: "11, 15 & 17 for B1.111, 16 & 17 for B1.212 & 15 for B1.313 & 14 for B2" while the applicable subjects are expected to be indicated by an 'X' (ref. introductory paragraph of section 2. of Appendix I). The way the applicability of the subject modules 11 to 17 is indicated for category C license is unclear. No key is provided. In addition, it seems that the applicability is for license extension only. Note: In case of different competence requirements for category C license for CMPA and other than CMPA, it should be specified.	Noted. Table of Appendix I now is clearer for Cat. C who are required to have the same level of knowledge as B1 and B2 as specified in the table according to the selected B1 or B2 category's path.
370	AIRBUS	Page 25 and 26 of 258; Appendix I, section 2 (matrix tables 1 and 2), entry related to Modules 18 and 13L. Page 39 of 258; Appendix I, § Module 18. Page 83 of 258; AMC to section 2 of Appendix I, Module 18. Page 162 of 258, Appendix VII, table of contents, module 13L. Page 167 of 258, Appendix VII, § Module 13L. Page 185 of 258, AMC to Appendix VII, § Module 13L. Comment: It is proposed to delete the term "assessment" from the title for Modules 18 and 13L. (Can "practical skills" be appropriate?) Rationale: The subject modules are dedicated to competence. The title of the modules should not mislead readers (with the competence evaluation).	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
371	AIRBUS	Page 150 of 258; AMC to Section 1 of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-job training'. Comment: It is proposed to move this AMC to Part-147. This AMC should refer to EAMTC GR-1004 standard to detail evaluation criteria. Rationale: This AMC relates to learning methods and therefore it is more appropriate for Part-147. Specific level of criteria need to be detailed for evaluation of MSTDs and MTDs in type training courses. These evaluation criteria and their levels are included in the EAMTC GR-1004 standard (level A, B, C and D). Reference to this standard should be given in this AMC. These levels are needed to enable an evaluation of MSTDs/MTDs and should be linked to the transferability of KSA.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
372	AIRBUS	Page 152 of 258; AMC to point 3.1(d) of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-job training', §4.(b). Comment: Paragraph 4.(b) of this AMC should read: "(b) The use of an MSTD (i.e.g. flat panel trainer) comprising aircraft-type-specific software may result in the duration of the training being reduced due to a more effective transfer of knowledge." Rationale: A flat panel trainer is an example of MSTD.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
373	AIRBUS	Page 162 of 258; Appendix VII Comment: The first table of Appendix VII should include the Module 13L for all subcategory of L license. Rationale: The Module 13L is dedicated to practical skills. As per point 66.A.25, only category C license are exempted from practical assessment.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
374	AIRBUS	Page 188 of 258; Appendix VIII, §(c) Comment: The title of paragraph (c) of Appendix VIII should be changed to read: "(c) Module 13L — PRACTICAL ASSESSMENT" Rationale: The Appendix VIII defines the basic examination and assessment standard for category L license. The modules applicable to category L license are given in Appendix VII. In its table of contents, the "practical assessment module is defined as "Module 13L".	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
375	AIRBUS	Page 209 of 258; Appendix IX — Evaluation method for the multimedia-based training (MBT) Comment: It would appear that the text of this appendix is not mature enough. It is proposed to move its content into Part-147 and to review it within the frame of RMT.0544. Rationale: This appendix mixes IR, AMC and GM. It should be reworked to separate items depending on their nature. Most of the content relates to learning methods and therefore it is more appropriate for Part-147. The one size fits all criteria is not appropriate. Some criteria seem to be defined for self-centered trainings only and not appropriate for MSTDs or MTDs used in instructor led courses (e.g. "Student-centered learning is present."; "The resource enables communication between students"). A review during RMT.0544 for inclusion into Part-147 would allow to refine this appendix.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
376	AIRBUS	Page 213 of 258; Appendix I — Aircraft Type Ratings for Part-66 Aircraft Maintenance Licences. Comment: Please clarify the meaning of the proposed change. Rationale: The proposed text is highlighted in yellow. No associated key is available in paragraph '3. Proposed amendments and rationale in detail' (page 9 of 258).	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
377	AIRBUS	Page 248 of 258; AMC 147.A.115(a) Instructional equipment Comment: It is proposed to amend this AMC to read: "If the Part-147 organisation transfers knowledge through a virtually controlled environment (e.g. distance learning, computer-based training (CBT) or multimedia-based training (MBT)), the organisation should ensure that: — [...] — the computer system requirements of any third-party provider are covered by a written agreement concluded between the two parties Part-147 organization and the computer system provider and includes the terms of delivery, data security and data integrity." Rationale: The 3rd chapter of this AMC requires clarification regarding the targeted "two parties". If they are the Part-147 organization and the computer system provider, it needs to be explicitly stated.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
378	AIRBUS	Page 248 of 258; GM to 147.A.115(a);(d)Comment:GM to Section 3 of Appendix III to Part-66, referenced in paragraph 1. of GM to 147.A.115(a);(d), is not available.Rationale:Self-explanatory.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
379	AIRBUS	Page 248 of 258; GM to 147.A.115(a);(d)Comment:It is proposed to amend GM to 147.A.115(a);(d) paragraph 1. to clarify the subject of the "description" and the "definitions": "1. Refer to [...] for the description of instructional equipment, and to point 7 of the AMC to Section 1 of Appendix III to Part-66 for the definitions of MSTDs and MTD."Rationale:GM to 147.A.115 is dedicated to Instructional equipment.Point 7 of the AMC to Section 1 of Appendix III to Part-66 details the considerations of the integration and usage of MSTDs and MTDs.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
380	AIRBUS	Page 248 of 258; AMC 147.A.130(a)Comment:It is proposed to remove the limitation on distance learning training methods for Level 3.Rationale:In the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014 Issue 2 — Amendment 2, the distance learning training methods are assessed to be of a limited suitability for level 3 elements of theoretical courses. This limitation seems appropriate for Distance learning asynchronous (E-Learning) However, the experience gained during the Covid containment period (at Airbus over than one thousand students have been trained like this), demonstrates that if the classic training methods (i.e. face-to-face classroom instruction) are adapted to virtual classroom instruction (Instructor lead in real time with appropriate equipment and tools) the distance learning synchronous method ensures the theoretical element part is delivered at the same standard as face to face in the classroom.This experience demonstrates that this method is relevant for Level 3, as well.This is due to the fact that the Instructor can monitor the body language and behavior of the trainees and the trainees can ask questions all in real time.	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
381	AIRBUS	Page 249 of 258; point 147.A.135(d)Comment:It is proposed to amend point 147.A.135(d) to read:"(d) The examination shall be performed in a controlled environment by a Part-147 training organisation and described in its maintenance training organisation exposition (MTOE). For examination purposes, a 'controlled environment' shall be that for which the following can be established and verified: 1. the identity of the students,2. the proper conduct of the examination process,3. the physical presence of an examiner/invigilator to ensure the integrity of the examination, and4. the security of the examination material."Rationale:There must be a physical presence of a theoretical knowledge examiner/invigilator to monitor and ensure the proper conduct of the examination.This should be enforced in this point.Cheating prevention being one of the main priorities of the PART 147 evolution, we believe that the authorization	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		of examination in a virtual environment (online tests) without the physical presence of a representative from the Part-147 organization does not ensure the integrity of the examination session, increases the risk of cheating and potentially impacts the security of the exam databank (e.g. recording of exam questions displayed on the student's screen).	
382	AIRBUS	Page 251 of 258; Appendix III (to Annex IV) - titleComment:Appendix III — Certificates of Recognition (CoR) referred to in Annex IV (Part-147) — EASA Forms 148 and 149Rationale:Typo suspected.	Accepted.
383	Aircraft Engineers International	Page 31.1. As member of this rule making group, I would like to comment on the working conditions for the rule making group (RMG) RMT.0255 (MDM.059) and how this NPA was developed. The second half of the duration of this rule making group the RMG had to work under Covid-19 restrictions, with e.g., multiple WebEx meetings, difficult to follow the agenda, several RMG members from the industry had trouble participating and excused themselves for several of the meetings during last months of the RMG work. The Multimedia-based training and distance learning subjects in NPA 2020-12 was not part of the RMG for RMT.0255 (MDM.059). These subjects were already developed by RMT.0281 (MDM.082). The OJT subject, (objective (b)), was controversial within the RMG and any group consensus questionable. AEI argued that surrendering the OJT to the Part-145 approval and introduce mandatory mutual recognition will remove today's strong standardisation effect of the possibility for the Part-66 licensing NAA to reject the OJT system of a foreign Part-145. Other group member(s) could not see any benefit from having the NAA involved inside a Part-145 process of OJT. EASA has chosen to keep the OJT subject wide open, by-passing the rulemaking group when they ask for all new proposals in paragraph 2.4 in this NPA 2020-12. This is very surprising since EASA has been asking for proposals on the OJT subject in the "EASA 2016 survey — Review of Part-66 and Part-147" and answers from the NAAs and industry has already been included in their "Evaluation report related to the EASA maintenance licensing system and maintenance training organisations of 02/03/2018". This makes it very difficult to make any serious proposal on the OJT subject for a third time, and one might suspect there is a preferred answer EASA is looking for.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
384	Aircraft Engineers International	Page 6.Table synthesises, obj. (b): AEI do not agree that the proposed forced mutual recognition of the OJT has "No specific drawbacks". AEI argued repeatedly in the rulemaking group that the current possibility for any licensing Competent Authorities to not accept an OJT scheme suspected to be sub-standard has a powerful standardization effect.Justification:The solution proposed in this NPA 2020-12, without any compensating standardisation for the OJT in place, will	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		facilitate major differences throughout EASA member states and jeopardize the recognition of the licence itself (Evaluation report related to the EASA maintenance licensing system and maintenance training organisations of 02/03/2018). This will have severe negative effect for the airlines that are dependent of having their aircrafts maintained in any location with a Part-145 approved organisation.	identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
385	Aircraft Engineers International	Page 7 and 8.Objective (b) OJT. The OJT must be kept in Part-66 as it is now and not be moved to Part-145.AEI propose to involve the Part-66 licencing department, within the same member state as the NAA for the Part-145 organisation, in the assessment procedure of the OJT. The licencing NAA should nominate experienced maintenance staff as members of an assessment group for OJT assessment in organisations approved by that member state. If the organisation has approved stations in several countries, there may be a cooperation and sharing of assessment groups between different member states NAA.Justification:This will more likely ensure a common standard for OJT assessment throughout EASA member states.AEI experience is that a Part-145 audit team do not have the necessary competence in licencing, training and OJT issues and therefore are not suited to oversee and approve these activities.It will simplify the proposed OJT procedures in Appendix III paragraph 6. of this NPA by ensuring the independence of the assessor for the OJT, thus removing the need for an independent observer. This procedure has successfully been implemented in the assessment procedure for the purpose of “certificate of apprentice as skilled worker” in e.g., Norway and Denmark. It is a proven concept that is run by the authorities and works very well as the last check-out.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
386	Aircraft Engineers International	Table synthesises, obj. (d): Our experience is that the training organisations already has implemented some flexibility by “weighting” subjects within basic modules based on their relevance. AEI recognize the need for some flexibility and the new AMC material for the basic knowledge modules makes sense in this context.	Noted.
387	Aircraft Engineers International	Page 11 and 12.66.A.25 Basic competency requirements.AEI supports the introduction of practical skill test and making the Basic requirements more focused on competency, while still keeping the knowledge requirements robust. This will help the situation within the industry on the complaints of the lack of skills on new candidates, ref. objective (c) in Ch. 2.1.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
388	Aircraft Engineers International	Page 22. 66.B.115 and AMC 66.B115.There is no need for the change to make it mandatory for the NAA to accept an OJT scheme from any EASA Part-145 organisation in any country. The possibility to accept OJT from other countries is already there in today’s AMC. JustificationThe “EASA 2016 survey — Review of	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Part-66 and Part-147” asked the stakeholders on their view on mutual recognition of OJT. The following “Evaluation report related to the EASA maintenance licensing system and maintenance training organisations” that EASA published 02/03/2018 had some interesting conclusions in paragraph 2.7.2: “The replies are mixed. Interestingly, the respondent’s representative of the industry do not push for a mutual recognition and even some industry representatives would question the mutual recognition if it did happen. The NAAs who responded to the survey are generally in favour of such a mutual recognition.” This indicates that the industry and licence holders do not trust a system of mutual recognition of the OJT, and even suggest they would question the licence if it happened. The NAA are generally in favour. AEI believe that the NAA are more distant to the reality and therefore do not see the problems connected to the mutual recognition, but they do see the benefit of less work looking into OJT schemes.</p>	<p>OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.</p>
389	Aircraft Engineers International	<p>Page. 230. AEI propose to give more guidance to the “similar tasks” in Appendix II — Aircraft Type Practical Experience and On-the-Job Training — List of Tasks: Some tasks can be performed on another aircraft type common to the aircraft type being trained as long as both the system and the task are similar. Note: Aircraft type common to; means common aircraft manufacturer, family, manuals and technology, e.g., from Airbus A320 up to Airbus A340. As another example, Airbus A350 and Airbus A380 will not be considered common to Airbus A320 in technology. Justification: The purpose of the OJT is to prepare the AML holder for the duties and task connected to the first CRS authorisation. Therefore, the concept of similar should be kept close to the actual aircraft the candidate is training in terms of manuals, technology and other procedures.</p>	<p>Noted. A task may be performed on the analogous system installed on a different aircraft type when the systems are similar in terms of design architecture, technology, and functionality. This can be the case, for example, for tasks carried out on engines or landing gears of the same manufacturer (6.2)</p>
390	Aircraft Engineers International	<p>Page 250 147.A.200 Approved basic training course [...] (g) Notwithstanding point (f), in order to benefit from changes in training technologies and methods (theoretical training), the number of hours as established in Appendix I (Basic training course duration) may be amended provided the syllabus content and schedule describe and justify the proposed changes. A procedure shall be included in the maintenance training organisation exposition (MTOE) to justify these changes. Comment: The use of new training methods as well as the push for introduction of Competency Based Training is often promoted by pointing at the future shortage of Aircraft Maintenance Personnel and the need for shorter duration in training. This argument should not be the main driver for a change of the regulation. We oppose a change allowing less hours than stated in Appendix 1 minimum duration. Courses with more hours than minimum duration can still benefit from changes in training technologies and methods. Standardisation and the legal</p>	<p>Noted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>aspectsIf the regulation is changed to make it possible to divert (go below) the minimum duration stated in Part 147 Annex 1, we will see negative consequences on standardisation. If that kind of diversion is to be approved by the competent authority (CA) of each member state (MS) it will have a negative effect on the function of the EU single market. The member states aviation authorities will have a hard time to assess the benefits of new training methods. We have reasons to believe the complexity of this assessment will make it hard for the CAs to question the training duration. It is a well-known problem that resources, and competence level differs between the CAs. Standardisation is already a problem in many other areas so this would add additional problems to keep a level playing field. Legal issues have been raised from EASAs legal department as well as from DG-MOVE when regulatory changes have been proposed in line with this. Wrong way of implementationBenefits from new training methods is possible but certainly not always the case. In any case, such new technology must as a minimum document how it affects the human ability to learn. And concrete how it makes it possible to learn the same over a shorter period of time. The concern is that this new technology will focus on learning the exams and not be a lasting learning of the subjects. It may improve the quality of training in some cases but that should not be taken as excuse for shorter training duration, below minimum duration. Also, the crisis in the aviation industry has totally changed the need for supplying the market with more staff. To start with the argument “lack of staff” should never have been used a key driver for this change. Duration is one of the key elements in Basic Training Basic Training is, in some member states, a part of the state controlled educational system. This education is normally financed for- and performed during a fixed duration. In addition to our general concerns for standardisation, this will undermine the national educational systems and create a market for the lowest bidders. “Come to us, students normally just have to stay here for 2000 hours instead of the 2400 hours stated in the regulation for minimum duration”. Leading and coordination as well as safety critical decision making is an important part of the profession. These abilities normally come with a certain level of education, including time spent. We strongly believe that a certain duration in basic training is one factor to prepare students for their future role as a licensed aircraft engineer.</p>	
391	Luftsport Verband Bayern e.V.	<p>As one of the largest GA associations in Germany the Bavarian Air Sports Association (Luftsport-Verband Bayern) is surprised to find an NPA trying to improve the L-Licenses just a few months after these were “released to service”. So the survey mentioned in the NPA, which was published in 2018 could not cover the practical issues of L-Licenses because these were not in service at that</p>	<p>Noted. The main scope of the RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’;</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>time. It looks like these proposals were developed for the commercial licenses and then imposed onto the GA. But this is against the GA roadmap which should make things in GA easier to handle. Since the time the L-Licenses were practically made available we have also discovered several issues for improvements. Nevertheless these do not coincide with the ones proposed in the NPA, probably caused by the fact that the rule making group did not contain any members of the sports flying community. So we will take the opportunity to comment afterwards the NPA and the current Part-66 regarding L-Licenses.</p>	<p>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</p> <p>— reduce the deficit of the practical skills of maintenance staff; and</p> <p>— update the basic knowledge syllabus.</p> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.</p> <p>It seems that the current Module 8L ‘Powerplant’ (and 7L ‘Airframe’) contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes &lt; 1.2t. Some members of GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.</p>
392	Luftsport Verband Bayern e.V.	<p>(General Comments) Why and what, 2.1 (c)“... without the requirement to attend a regular basic training where practical skills are assessed throughout the training.” In Germany we never had regular training courses by an (NAA) approved organisation for more than 50 years and we did not consider this a safety thread. The training was done by the sports associations and they have a vital interest in getting only those people through the exam (at the end of the training) which have good skills. Even the people getting a (Prüfer Klasse 3) national license by the German LBA never had to pass an official practical training. They had to provide evidence of 2 years practical experience (signed by another Prüfer Klasse 3) and to prove their skills in a practical assessment of approx. ½ day in front of a NAA representative.</p>	<p>Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.</p>
393	Luftsport Verband Bayern e.V.	<p>(General comment)Benefits and drawbacks 2.4 (c)There is a major drawback for applicants for an L-License because they will have to do an assessment for sure. At the moment there are no Part-147 organisations approved for L-Licenses and it looks that no ones will develop in the future because these are simply too expensive for our flying community which is based on maintenance on a voluntary basis.</p>	<p>Noted.</p> <p>NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
394	Luftsport Verband Bayern e.V.	(General comments) 2.4 (e) We understand that the “Group E” will be introduced for A- and B-Licenses only while the electric propulsion should be incorporated into the 8L.10-Module for L-Licenses. This seems acceptable. Furthermore it would be a real benefit if the “Power Plant” module would get its own Subcategory (e.g. LP). We have a lot of people in the community which have detailed knowledge of motors and would be interested to support our maintenance with their knowledge but they have no interest in maintaining aircraft structures.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 ‘New air mobility’.
397	Luftsport Verband Bayern e.V.	Part-66 (existing) 66.A.10 (e) Is it worth to add an “approved maintenance organisation acc. to Part-CAO” here to allow this organisations to send the AML to the authority too?	Accepted. Part-CAO will be added.
398	Luftsport Verband Bayern e.V.	Part-66 (existing) 66.A.20 (b)(2) The requirement for 6 months of maintenance experience within the last 2 years can impossibly be met by our staff working on a volunteer basis and is not adequate for the work to be done. For L-License this should be changed to “.. he/she has sufficient experience in accordance with the privileges granted ...” and “sufficient” should be detailed in the AMC 66.A.20 (b)(2).	Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.
399	Luftsport Verband Bayern e.V.	Part-66 (existing) AMC 66.A.20 (b)(2) Even the reductions in point 1 of this AMC are not adequate for our staff working on a volunteer basis. 100 days – or by reduction through the NAA – 50 days within 2 years times 8 hours would mean 400 hours within 2 years. This is the equivalent of 2 ½ months of an employee! The example shown in the AMC for owner of an aircraft who is doing his own maintenance leads to the equivalent of one 100 hours inspection per year – 2 days one annual inspection per year – 1 day = 6 days per 2 years, which is far away from the 50 days requirement. So something in between the two boundaries would be acceptable for the recreational sport like “5 RTS within one year as working or supervising CS covering the major part of the granted privileges”, not relying on hours spend but more on RTS done or supervised.	Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.
400	Luftsport Verband Bayern e.V.	Part-66 (existing) GM 66.A.20 (a) 1. Definitions: “.. When working on cables and connectors .... The following typical practices are included in the privileges:” Please add “rewiring, exchange of cables and harnesses” to the list of privileges. The cables and harnesses are quite simple in sailplanes, powered sailplanes and ELA 1 airplanes and sometimes need rearrangement (new	Not accepted. These definitions apply also to B1 categories involving more complex aircraft.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		equipment) and renewal. These cables – if properly fused – are not critical regarding operational risks of ELA 1 aircraft.	
401	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detail 66.A.25 (a) The NPA wants to introduce an examination of the applicant for a AML. For L-Licenses the examiner body seems inadequate because there are no Part-147 organisations which could do the examination (especially for sailplanes, powered sailplanes and ballons) and and if so this examination will be very costly examination by the competent authority is also costly and competent examiners for sailplanes, powered sailplanes and ballons are rare So the examination is practically left for “other organisations” but these are depending on the agreement of the NAA. Our proposal would be that the “other organisation” doesn’t need agreement but the NAA should have the right to supervise the examination.	Not Accepted. As the case is already today, the examinations for L licences can be already performed in other organisations as specified in GM 66.A.25(b).
402	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detail 66.A.25 (c) Please add the “other organisation” of 66.A.25 (a) to the end of the new paragraph “... carried out by a training organisation that is approved in accordance with Part-147 or by the licensing authority or by an organisation as listed in (a) (iii).”	Accepted. 66.A.25 is reworded.
403	Luftsport Verband Bayern e.V.	Part-66 (existing)AMC 66.A.25 1. In paragraph 1. the wording “.. from a recognised university or other higher educational institute ...” may be misinterpreted that universities of applied science are not appropriate (university or higher) to fulfil the requirement. Please change the wording so that these are also included.	Accepted. Other applied science discipline added.
404	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detailAMC 66.A.25 3.Please add the “other organisation” of 66.A.25 (a) to the end of the new paragraph “issued by an approved Part-147 organisation or by the competent authority or by an organisation as listed in 66.A.20 (a) (III) in case the organisation is of the same country as the NAA issuing the AML.”	Partially accepted. 66.A.25 is reworded to include possibility for non-Part-147 organisations to carry out examination for L licences.
405	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detail AMC 66.A.30 (e) 1. (i)“... the minimum additional experience in aircraft maintenance organisation(s) that are approved in accordance with Part-145 or Part-CAO should be – for categories A and L: 6 months;”The candidates applying for an L-License are mainly working on a voluntary basis in our clubs. They have another professional career or are students. So they don’t have the possibility to work in a maintenance organisation for 6 months. Additionally maintenance organisations will not be reluctant to provide education for future competing personnel. So this requirement will jeopardise the availability to get new personnel at all. This requirement needs to be withdrawn! Table A (page 159) has to be adopted accordingly.	Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
406	Luftsport Verband Bayern e.V.	Part-66 (existing) 66.A.40 (a)The licenses for pilots are issued with unlimited validity and the privileges are just related on the experience (starts and flying hours) within the last two years.The licenses of the AML - especially regarding the L-Licenses - have a limited validity. Why? There is no real purpose in the renewal except to say "hello". The NAA has anyway the possibility to withdraw the license in case of a safety issue. So why not issuing the license with unlimited duration. The keep and record the current practice is anyway task of the AML.	Noted. The topic was discussed in the RMT.0255 discussion and it was accepted to keep the requirement to renew the licence every 5 years. It is the only means for the licencing authority to have a minimum of oversight on the AML holder.
407	Luftsport Verband Bayern e.V.	Part-66 (existing) 66.A.40 (b)Is it worth to add an "approved maintenance organisation acc. to Part-CAO" here to allow this organisations to send the AML to the authority too?	Accepted. Part-CAO will be added.
408	Luftsport Verband Bayern e.V.	Part-66 (existing) AMC 66.A.45 (d); (e)3; (f)1...It is impossible to cover the practical experience for the L-License asked for in this AMC because 50% of the points listed in the paragraphs related to B1, B2, B2L and B3 are not covered by the syllabus of the L-License.	Not accepted. Practical experience of L1 and L2 should cover 50% of tasks already defined in Appendix II point B.
409	Luftsport Verband Bayern e.V.	Part-66 (existing) 66.A.50 (a)Limitations entered into the AML according 66.A.45 are affecting the aircraft in its entirety. So the interpretation is that a CS having passed module 8L for wooden aircraft is not allowed to release work on the same motor in a composite aircraft and vice versa. This is absolutely incomprehensible and devoid of any logic, especially in the light of AMC 66.A.20(b)(2) "Two aircraft can be considered to be similar when they have similar technology, construction and comparable systems .... – propulsion systems..." The same applies to CS which have passed module 5L. They are not allowed to release the same composite work on powered gliders if they don't have passed module 8L.	Noted. EASA would recommend that all the private owners of sport leisure aviation coordinate with the official representative stakeholders in EASA (e.g. EAS, iAOPA, EGU) the proposals for future rulemaking activities.
410	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detailAppendix VII to Annex III Table of contents: Module 8LThe content of Module 8L regarding turbines is not appropriate to the L-License. ELA1 aircraft do not have turbines. Some (seldom) powered sailplanes have very small turbines with no serviceable parts inside. The maintenance of these is just visual and functional testing. If there is something wrong with these turbines than it has to be uninstalled, sent to the manufacturer for repair and installed again. So to reflect the (non-)complexity of these turbines reduce the level of competence for 8L.11 from 2 to 1 and delete 8L.12 through 8L.16 from the content.	Noted. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes < 1.2t. Some members of GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255.
411	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detailAppendix VIII to Annex III Exam and assessment standard As mentioned above the new regulation of L-Licenses is just gone to the practical stage and the EASA survey justifying this NPA did not cover the corresponding outcome of the regulation. Where is the justification for the increase of the number of questions and time for this licenses?	Noted. See the response to comment # 95.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
412	Luftsport Verband Bayern e.V.	Proposed amendments and rational in detail Appendix VII to Annex III Table of contents: Module 13L As detailed above [Why and what, 2.1 (c), page 4] the assessment duration of 2 days is not appropriate to the level of work done by a L-License holder. The practical assessment was ½ day before EASA and should not be increased without having a safety issue identified. Module 13L	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
413	IACO - International Aviation Consulting	The Part 66/147 should define criteria for the level of study for entry into part 147 basic training. Because beyond passing the exams, the technician must know how to communicate with the manufacturer, be effective in analysing and resolving troubles and adjustments, and know how to communicate effectively in writing or orally with the CAMO. In France, recruitment is done at the « Bac Pro » level. This entry level is far too low to train technicians who will then be certification staff or will be transferred to CAMOs or even hired within the competent authorities. Part 66 has now been in force for 20 years and with the departure of the "grandfather's law" technicians there has been a significant drop in the level. Entry to Part 147 schools should be at Bac (not Bac pro) or BTS level, as the knowledge and skills required of aeronautical technicians are so vast and demanding, with the evolution of techniques in design and production (electric flight controls FBW, carbon materials, FADEC on piston engines, etc.). Examples of problems observed : not knowing how to measure a dimension, not knowing how to establish a weight and balance sheet, not understanding an AD, not knowing how to communicate the result of a task in writing on the work report, not knowing how to carry out a special inspection, not measuring one's responsibility when signing a handover, not mastering English, not knowing how to personalise an AMP, not understanding an AMP, writing an AMP without understanding its meaning, not knowing how to establish a life limit when the aircraft changes operating conditions, etc. The orientation in "bac pro" is especially intended for the young wishing to be directed towards a manual job without long theoretical studies. The Ministry of french Education has wrongly considered that the aeronautical technician was part of this category, which is a big mistake impacting safety.	Noted. The scope of this RMT.0255 was not to resolve the numerous issues of Part-66 but rather to resolve four well defined issues: Group 1 aircraft without Part-147 TT available, revision and update the BK modules, OJT troubles, lack of practical skills and the need to find a solution for the licence applicable to those new aircraft with electrical propulsion.
414	CAA-NO	Page 8: With reference to «specific request to stakeholders» point a) under «as regards objective b»: CAA-NO sees the positive sides of moving the requirements regarding OJT from Part-66 to Part-145. We think this would enhance the understanding in the Part-145 organisations that it is in fact they who have the responsibility for the quality of the OJT process and that the assessment of competency of the persons undergoing OJT is also the responsibility of the Part-145. This would also remove/ limit the complications	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		that comes from Part-66/145/CAO often being organised in different departments in the N-CAA's.	
415	CAA-NO	Page 23 Appendix I – Basic Knowledge and practical assessment Requirements (except for category L licence). With reference to new IR 66.B.135 and the wording “aircraft basic training”. Should the correct wording have been changed to “Basic Knowledge and practical assessment Requirements”? (Since the reference in the section refers to Appendix I) comment: Page 23 The competent authority, whenever it approves courses, including multimedia-based training (MBT) courses, which are delivered in a physical and/or virtual environment, shall verify that the aircraft basic training and the aircraft type training comply with Appendix I and Appendix III respectively. The approval procedure shall include the principles and criteria of Appendix IX ‘Evaluation method for the multimedia-based training (MBT)’.	Not accepted. The authority approves the training not the assessments. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
416	CAA-NO	Positive feedback: · 66.A.25 (a) (iii) – It’s a good solution that EASA has agreed the opportunity to allow other organisations to perform examination withing category L. (As agreed by the competent authority within the actual member state). AMC 66.A.25 (3) Give the competent authority the opportunity to give out their own CoR template (EASA Form 148 (b)), when examination is performed. 66.A.30 5. (g) – basic training course complete with only examination CoR in M1 and M2. This is a positive change for the basic training schools who are struggling with being able to cover the requirement for 2400 hrs course in 2 years. 66.B.115 – Do not need to re-approve OJT program already approved by different competent authority within a member state 66.B.130 (c) - CoR and mutual recognition of direct approved courses can give great benefits. Gives the competent authority opportunity to give out CoR template (EASA Form 149 (b), when relevant type training and type examination is performed. 66.B.135 / Appendix IX - Evaluation method for MBT: good guide for the N-CAA's. 66.B.400 – opening for already given examination credits by a competent authority of another member state?	Noted.
417	CAA-NO	Page 229 Regarding Appendix II to AMC list of tasks A1 : skills related to duties and responsibility – very good that this comes into the regulation as we see it as an area that lacks control today	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
418	CAA-NO	Page 92· AMC to Appendix II – Number of questions per subject. Very good that EASA has made a table that shows the acceptable number of questions for each submodule.	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
419	CAA-NO	66.B.400/ (405) point (b) (iii) – Examination Credits – Need a clarification of the meaning of a formal statement developed by another Competent Authority? - Should Examination credit report be sent to the licencing Authority?	Accepted. Clarification is made adding the following point (d) in point 66.B.400: 'When an applicant refers to a credit report approved by another competent authority, the licencing authority shall consider such credit report and seek advice from the other authority for the use of the credit report.'
420	CAA-NO	Page 88 Appendix II to Annex III point 1.12 (f). – (Retake of examinations). In what way should the MTO or the Competent Authority verify/check the number of attempts within the applicable time frame?	Noted. The NCA and ATO can communicate each other and cross-check the self-declaration made by the student.
421	CAA-NO	Page 91 Appendix II to Annex III 3. Module 18 – Practical assessment - will this be a separate rating applied for and granted on the Part-147 EASA Form 11 Approval?	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
422	CAA-NO	Appendix III - Aircraft type training and examination standard — On-the-job training (OJT): 6.3.2 How should it be documented that the CAA's accept an OJT mentor or assessor? Should the CAA's issue an approval to these persons?	Noted. These persons are accepted and not approved by the authority. Part-145 or CAO shall identify these persons.
423	CAA-NO	Page 143 Appendix III to Annex III point 4.1 (j). Does it mean that questions given as part of the training (MBT), shall not be used in the training course and the following examination? - What is the definition on phase examination?	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.
424	CAA-NO	6.3.1 general requirements: «The OJT shall involve actual task performance on aircraft and components, covering line and base maintenance activities» What about those working only in line maintenance? E.g companies with no base maintenance on their approval or in the country.Regarding Appendix III - Aircraft type training and examination standard — On-the-job training (OJT):6.3.3 OJT content: great to specify that the student must also be trained in «typical certifying staff activities» as opposed to only ticking of jobs in a list of tasks. In 6.5 we think it's very good that more requirements to the OJT assessment have been added.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
425	CAA-NO	6.4 Performance of the OJT: Point 9 – Aircraft rating and category applied for - Need a clarification if there is any opportunities to add both B1 & B2 task's in the same OJT program?	Noted. Yes, there is.
426	CAA-NO	In GM to point 1(c) of Appendix III to Part-66 – In the second paragraph – replace "After 3 years,...." with "If the candidate has not completed the B2 OJT within the expiree date of the type training course COR,..." Page 151 Recommend to replace text with "If the candidate has not completed the B2 OJT within the expiree date of the type training course COR,..."	Not accepted.
428	CAA-NO	Page 158 Appendix IV to Part-66 A. «The experience requirement will be reduced by 50 % if the applicant has completed an approved Part-147 course relevant to the subcategory» We wish for the regulation to state that the course in question must be "a basic training course". It's a common misunderstanding that a type training course is enough to reduce the requirement by 50%.	Accepted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
429	CAA-NO	Page 254 & 255 Appendix III to Annex IV (Part-147) - CoR template EASA Form 149a, b and c – The text in the templates needs to be adjusted so that the CAA's and organisations can delete enough/appropriate text to issue the CoR for only a passed type examination (when no type rating course has been performed).	Accepted, CoRs 148x and 149x have been amended.
430	AIRBUS	We have to report some difficulties when entering comments in the CRT tool. For example, some formatting options lead to strange results (for example using "change background color" actually changes the font but not the background). For this specific NPA, we believe that the breakdown of the sections is not refined enough. For example, we assigned 37 comments on the section "3. Proposed amendments and rationale in detail ". This highly complicates the reading and the understanding of the comments.	Noted.
431	Finnish Transport and Communications Agency Traficom	147.A.100(b)CAA-FI supports removing of exact class size. However, there is a need for class size guidelines in different subject modules and learning environments.	Noted.
433	European Gliding Union (EGU)	IMPLEMENTATION OF CURRENT PART66L, AS EXPERIENCED IN THE SPORT OF GLIDING From the experience of our member organisations in European nations the EGU wishes to make observations on Part 66L rules. As an overall assessment, the inception of previously nationally qualified engineers into Part66L has been relatively seamless thank mostly the cooperation with NAA's. However, in respect of RMT0255 arising virtually simultaneously with the original implementation process, we raise the following experiences: 1. As applied to sport aviation activities the 'recency' criteria whereby the continuing qualification of engineers is maintained is inconsistent and open to interpretation. We understand that short term actions are in hand to address this issue. 2. While the 66L categorisation of engineer privileges is very different to that operated by many nations the depth of definition of individual categories (i.e. L2, L1C etc), accompanied by the policy of applied 'limitations' appears capable of accommodation. We would not recommend any more detailed or 'granularity' in the qualification designations. However we do consider that the boundaries between motorised and motor-assisted sailplanes might be more closely aligned with Certification Specifications, in particular CS-22. In this CS, self sustaining and self launching motor gliders dispose of motors which are not defined as flight critical. These could be accommodated suitably in the L1 category rather than L2 which requires abilities appropriate to much more sophisticated and flight critical powerplants. 3. The education and qualification of future applicants for 66L accreditation must not be made more onerous, costly or severe than the presently implementing regulation. . It remains vital that this function remains	Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: <ul style="list-style-type: none"> <li>– facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>– enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>– reduce the deficit of the practical skills of maintenance staff; and</li> <li>– update the basic knowledge syllabus.</li> </ul> A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences. It seems that the current Module 8L 'Powerplant' (and 7L 'Airframe') contains too heavy subjects on piston/turbine/electrical/hybrid propulsions that were put there to cover a (too) wide range of products: from very simple powered sailplanes to more complex aeroplanes < 1.2t. Some members of GA community ask for a diverse redefinition of the content of these modules and new assignment of the applicability for the L1 and L2 licences. Also this topic was not part of the discussion within RMT.0255 but deserves more focused discussions, actions and consultations that, so far, are outside the scope of RMT.0255. EASA would recommend that all the private owners of sport leisure aviation



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>within the sporting community, through a system of Qualified Entities. We recognise that the education and examination of candidates requires considerable further work, but this is already in hand in many nations, and our own effort and expense. Equally education (OJT) through involvement in an airsport community needs to attract proper definition. The alternative route as proposed in NPA2020-12, involving Part 147 organisations (assumed this to be applicable to airports, albeit not directly identified) is unworkable as described in previous comment and those made by Europe Air Sports. The criteria for all sport aviation activities must be maintained simple and accessible for the training of future young engineers. While EGU would normally expect to address specific points of an NPA, on this occasion we find particular difficulty as there are NO specific provision in respect of Sport/GA let alone gliding in EGU would normally expect to contribute additional detailed comments of NPA paragraphs, but on this occasion this is problematic, specifically because the draft NPA2020-12 makes not direct reference to either Sport/GA in general or gliding in particular, in spite of their being specific provisions for both in current Part66L, currently under implementation. As such, detailed 'para-by-para' commenting on our part would involve making 'local assumptions' which may be inappropriate or even invalid. For the present we can only assume that no specific provisions are intended for Sport/GA which will be required to fulfil the complete provision for full commercial operation for example. We remain concerned as to details and omissions which might be damaging to our interests but for the present be have confined our commenting to policy issues. We would make the strong point that we would anticipate better consultation and representation in the future, expecting this to come through the formal channels of Europe Air Sport whom we note have also limited their comments to policy issues.</p>	<p>coordinate with the official representative stakeholders in EASA (e.g. EAS, IAOPA, EGU) the proposals for future rulemaking activities.</p>
434	Icelandic Transport Authority	<p>ICETRA comment on specific request to stakeholders on OJT ICETRA considers option (a) in specific request to stakeholders appropriate. When reviewing OJT's experience for the first type rating in basic category; we believe that the OJT is too much burden and adds unnecessary complexity to the licencing system. It is not argued that from an academic point of view that the objective with the OJT can be considered „correct“. But; the whole path to the type rating and CRS authorisation needs to be taken into consideration. Before implementation of the OJT, (1149/2011) the student completed a list of tasks and the duration was as a period of 4 months of practical training for applicants with no recent recorded previous practical experience of aircraft of comparable construction and systems, including the engines This was replaced by Part 147 practical training followed by an OJT for the first type rating endorsement. Take as</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>example the typical student who starts his/her carrier in a Part 147 basic maintenance training organisation (MTO). The training will include in addition to theory lessons, practical lessons and an assessment .</p> <p>Part 147.A.200(e) states: „The practical assessment element shall cover the practical training and determine whether the student is competent at using tools and equipment and working in accordance with maintenance manuals“. In addition to the basic training certificate of recognition, the student will need 2 years of practical maintenance experience on operating aircraft (as a minimum), which is required to meet the criteria listed in the AMC 66.A.30(a)(4). The content/variety is to be checked by the NAA before issuing the basic licence. In order for this student to get the first type rating endorsed for aircraft type in e.g. group 1, the student must complete the Part 147 theoretical type training and examination and practical type training and assessment. On top of this, the student must complete an OJT and assessment in order to get the type rating endorsed in the licence. With the type rating endorsed, the student still has to go through an assessment per point 145.A.30(e), to ensure that the person is competent. AMC1</p> <p>145.A.30(e) states: „Competence should be defined as a measurable skill or standard of performance, knowledge and understanding taking into consideration attitude and behavior.“ The referenced procedure requires amongst others that planners, mechanics, specialised services staff, supervisors, certifying staff and support staff, whether employed or contracted, are assessed for competence before unsupervised work commences and competence is controlled on a continuous basis. Competence should be assessed by an evaluation of: - on-the-job performance and/or testing of knowledge by appropriately qualified personnel, and, - records for basic, organisational, and/or product type and differences training, and - experience records.“ Then the same procedure states that „Certifying staff are able to determine when the aircraft or aircraft component is ready to release to service and when it should not be released to service.“</p> <p>In addition, the point 145.A.35(a) requires the CRS person to be „competent“ and point 145.A.35(f) requires an assessment to ensure that all prospective certifying staff has competence, qualification and capability to carry out their duties before issue or re-issue of certifying staff authorisation. In the past, the list of tasks in appendix II to AMC to Part 66 for Part 147 practical type training and OJT performed under Part 145 has been the same, and the result has been that</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>there is in many cases similarities in the Part 147 practical training and the OJT. In many cases, there is duplication, and the only difference is that the OJT provides hands-on while the Part 147 practical training is more show and tell. When all other experience gained is summarised, it can be argued that the added value with the OJT compared to the time, effort and resources is justifiable. Another point regarding the OJT is that it can be difficult to complete the OJT if quantity and variety of maintenance tasks is limited. This can lead to a situation that it would be impossible for the licence holder to complete the OJT. E.g. technician without type rating is hired in a line environment, and the MO has approved OJT in the MOE, which meets the criteria in Part-66.</p> <p>The variety/complexity of maintenance performed over a period of time by this organisation could not be sufficient in order for the technician to complete the OJT to meet the requirement for type rating within the 3 years' time limit. Another controversy could be the situation where the first type rating is for example Beech King Air or Twin Otter on which the OJT was performed, and then the next type would be Boeing 787.</p> <p>If the assessment requirements before issuing CRS authorisation are summarised, the following is performed - Basic training assessment - NAA assessment of maintenance experience before issuing or extending a licence - Practical type training assessment - OJT assessment - Assessment according to Part 145.A.30 - Assessment according to Part 145.A.35 - Continuous assessment within the Part-145 MO - + proposed addition of assessment in this NPA (module 18), if applicable To simplify the system and reduce the complexity and complications introduced with the OJT ICETRA proposes that the OJT requirements for the first type rating is removed. The following points can be gained by doing this; - Less burden on the licence holder in order to get type rating endorsed in the licence - Less burden on maintenance organisations creating and maintaining the OJT program - Less administrative burden on the competent authorities accepting/approved the OJT program - No need to deal with cross-border issues regarding endorsement of type ratings - More efficient licensing system - More job opportunities for licence holders starting their career - Financial gain as the cost will decrease without affecting flight safety - The objective of the OJT in current rule is to gain the required competence and experience in performing safe maintenance. ICETRA considers that the current system with minor changes without OJT is sufficient to maintain this objective. Potential risks, if any, can be mitigated by formalising the assessment procedure</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>for Part 145.A.30 and 145.A.35. In many cases, this should provide in the end increased level of safety and more appropriate approach to the task.</p>	
435	Icelandic Transport Authority	<p>Feedback on Question to stakeholders mapped table in Section 2.4</p> <p>Obj. 2.4(b) In addition to ICETRA view that OJT requirement should be removed from Part 66 and the activity moved under Part 145 we would like to comment on the idea that specialised OJT programmes could be a business opportunity for many AMO's. In some cases the MO has been selling the OJT programme to individuals that are struggling to meet the requirements for their first type rating. In some cases the MO has been using them as workforce in performing maintenance at the same time without paying salaries. We consider this unfair from competition point of view in moral to have a system in place that provides MO business opportunities at the cost of the public (students) if there is not clear safety issue derived from it.</p> <p>Obj. 2.4(c) We support to add practical skill module in Appendix I (Module 18) for B1, B2 and B3 but consider that there is room for clarification. E.g. if holder of Part 66 licence with B1.1 rating decides to extend the licence and completes examination in module 12 (or relevant submodules to extend) does the person need assessment i.a.w. module 18? Same in the case if first Basic L rating is on balloon (L3H) then the assessment must focus on those modules. If the person then completes examination in additional modules required for L2 (modules 4L, 5L, 6L, 7L, 8L) will the person need practical assessment i.a.w. module 13 in those modules before extending the licence? (66.A.25(c))</p> <p>Obj. 2.4(e) ICETRA considers that the proposal for Module E is adding complexity to the licencing system and the need to add knowledge related to electrical propulsion can be done by other means by intergrating the topics into existing modules. We need to simplify the system rather than adding complexity. If aircraft with electrical propulsion would require individual type rating and placed in Group 1 would you need to complete module E? Does aeroplane with electrical propulsion fall under B1.1 or B1.2? (it is not turbine and not piston). ICETRA considers that the way forward is to add knowledge relating to electrical propulsion topics listed in "Module E" into existing modules in basic training applicable to "B" categories to stay intact with future developments and prepare future technicians. (electric propulsion in aeroplanes, helicopters, VTOL equipment, drones etc.) Fixed wing aircraft with electrical propulsion can then belong to either B1.1, B1.2 or B3 and electrical propulsion helicopters can belong to B1.3 or B1.4. New concepts e.g. VTOL can then belong to any of the B categories if the basic training syllabus is updated.</p>	<p>Noted. Due to the diverse and controversial comments received on this NPA, EASA has decided to keep the OJT where it is, but improving the standard in terms of procedures and selection of the OJT tasks.</p> <p>The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.</p> <p>The proposal of Module E for the electrical propulsion has been also rejected.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
436	Icelandic Transport Authority	66.A.45(i)Same comment as listed on Obj. 2.4(e) in feedback on question to stakeholders mapped in table in Section 2.4(ICETRA considers that the proposal for Module E is adding complexity to the licencing system and the need to add knowledge related to electrical propulsion can be done be other means by intergrating the topics into existing modules. We need to simplify the system rather than adding complexity. If aircraft with electrical propulsion would require individual type rating and placed in Group 1 would you need to complete module E ? Does aeroplane with electrical propulsion fall under B1.1 or B1.2 ? (it is not turbine and not piston). ICETRA considers that the way forward is to add knowledge relating to electrical propulsion topics listed in "Module E" into existing modules in basic training applicable to "B" categories to stay intact with future developments and prepare future technicians. (electric propulsion in aeroplanes, helicopters, VTOL equipment, drones etc.) Fixed wing aircraft with electrical propulsion can then belong to either B1.1, B1.2 or B3 and electrical propulsion helicopters can belong to B1.3 or B1.4. New concepts e.g. VTOL can then belong to any of the B categories if the basic training syllabus is updated.)	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
437	Finnish Transport and Communications Agency Traficom	chapter 2.4 table(a1) Mutual recognition of D-A TT: CAA-FI supports this proposal. However, it should be clear that the competent authority of the licence holder shall have some visibility to this direct approval.(a2) No comments(b1) Revised OJT: CAA-FI supports this idea of building OJT around first Group 1 a/c type instead of predefined task list.(b2) Mutually accepted OJT: CAA-FI supports mutually accepted OJT programs especially when the AML holder is clearly employee. We have seen some indications of sold OJTs and based on "Benefits" EASA supports this. Is there any risks involved? (c) Practical assesment module: CAA-FI support this in general, but requires information if this module can be offered by some other organisation than 147 or CA? It may lead to situation where 66/L licences can no longer be obtained. (d1) No comments(d2) Appendix 1 content to AMC: CAA-FI supports this and sees that it gives more flexibility. Is there possibility for AltMoCs?(e) Group E and "Electrical propulsion" module: CAA-FI request to clarify differences between "Electrical propulsion" module and 8L.10. Is 10 question multichoice exam really necessary to cover the knowledge for this new Group E or should we consider some other means, such as another limitation in Group 3/B3 and practical experience to remove this limitation? The current rule 66.A.25(b) says that "The holder of an aircraft maintenance licence in subcategory B1.2 or category B3 is deemed to meet the basic knowledge requirements for a licence in subcategories L1C, L1, L2C and L2". Proposed appendix IV table B requires 8L.10 module (B1.2-&gt;L2). This places license applicants in an unequal position depending on the time of application.	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
440	Icelandic Transport Authority	Comment on AMC to Section 6 of Appendix III to Part 66 "Aircraft type training and examination standard - On-the-job training (OJT)"6.4.3. OJT contentThe "typical certifying staff" activities listed are not related to type and belong to Part 145 certifying staff assessment but not OJT.The sentence "In case the manufacturer has defined the OJT tasks during the approval of a particular aircraft type ..... those tasks shall be selected. The OJT cannot be part of the OSD because it is only applicable for first type rating and therefore a licence holder that is adding second type to his licence would not be required to complete the tasks.6.4.3 para 3It is not realistic to expect that OJT should be performed both in line and base environment.	Noted. Indeed, now the OJT becomes more focused on the future responsibilities of the applicant as certifying staff rather than on the technical aspects of the aircraft type. OJT tasks may be recommended by the TCH; in that case, they shall be part of the OJT programme.
441	Lilium	Comment:Lilium believes that electrical aircraft will not be a "niche" market as many electrically powered aircraft will enter operation by 2025. The market outlook from researchers is projecting a huge market increase thereafter.Therefore, Lilium would like to propose that in addition to the proposed traditional B1 licence plus E module an unique B1E licence approach for electrically powered aircraft should be considered. This will allow in the future to train maintenance staff specifically for the requirements of electrically powered aircraft and to cater for the increasing market demand for this specific type of staff.Suggested resolution: Creating an additional unique B1E licence applicable to the specialities of electrically powered aircraft.Group E Training modules to be created based on Part 21 CS-MCSD process.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
443	AESA	Remove the OJT requirements from Part-66 and move them to Part-145 under point 145.A.35 'Personnel requirements' where the AMO shall ensure that maintenance staff have adequate competencies with regard to the aircraft maintained by the organisation;I agree with this option. I fact, before the OJT it was this way.The 145 itself, based on the skills of the maintenance technician, directly supervised and assessed by certifying staff, can provide the certification authorisation.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
444	Lilium	General remark:Lilium propose that Group E training module should not only be limited to electrical propulsion system but any novel or complex system that has been identified by Part 21 through the CS-MCSD process.Group E should not be limited only for electrical propulsion but as identify by CS-MCSD process. For example, Battery Management (fuel of the aircraft), high power bus bar (EWIS) and any novel technology introduced by the Part 21 organisation. GM 66.A.30(a) Basic experience requirementsComment:"Experience in working in an aircraft maintenance environment on a representative selection of tasks that are directly associated with aircraft maintenance' means experience gained at an organisation that is approved in accordance with Part-145, Part-CAO, Part-CAMO or similar."	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		Here especially Part-CAMO is mentioned. In the following paragraph "Part-CAMO" is missing. Suggested resolution: To ensure consistency, it is suggested to insert Part-CAMO in the following paragraph as well. AMC 66.A.30(e) Basic experience requirements Comments: In GM 66.A.30(a) Basic experience requirements it is mentioned "Experience in working in an aircraft maintenance environment on a representative selection of tasks that are directly associated with aircraft maintenance" means experience gained at an organisation that is approved in accordance with Part-145, Part-CAO, Part-CAMO or similar." Here especially Part-CAMO is mentioned. In the following AMC 66.A.30(e) Basic experience requirements "Part-CAMO" is missing. Suggested resolution: To ensure consistency, it is suggested to insert Part-CAMO in the sub-paragraphs 1. and 2. as well. GM 66.A.45 Endorsement with aircraft ratings Comments: For categories B2 and B2L the examination on Module E is not required as per "66.A.45 Endorsement with aircraft ratings" on page 18. Suggested resolution: To avoid misunderstandings, it is proposed to insert in in the table on page 22 for B2/B2L licence: "the examination on Module E is not required"	
445	AESA	147.A.135 and 147.A.145: In recent years, we have detected several cases of possible fraud in exams, performed at locations not identified in the approval certificate, of students who did not attend the basic training course at the maintenance training organisation. The possible fraud consists of giving a training prior the exams, which is beyond the scope of the 147 organization, in which the student is guided to pass the exams. The final result is the people can get all modules for a category / subcategory in 3 weeks. This is not fair. There are many complaints of 147 organizations which are complying with the Regulation. So, the proposal to avoid this fraud is the exams of students who did not attend the basic training course at the maintenance training organisation can be only carried out by the national Authorities. And these exams must have the recognition of all national Authorities to obtain the AML Part 66 in any country of EASA members.	Noted.
446	European Helicopter Association	AMC to section 6. 6.6 OJT assessment. Approved assessment protocol is completely new. Pass/ fail criteria is not well defined. The production of a simulated release to service could be difficult in a live electronic system.	Noted.
447	Volocopter	Comment to 66.A.45 Request for clarification: According to 66.A.45, the endorsement for group E aircraft is limited to one of the corresponding aircraft categories. As eVTOL uses a propulsion system other than piston or turbine, it does not directly fall into licence subcategories listed in 66.A.3. Therefore, a clarification would be needed which one of the licence subcategories could be used for eVTOL aircrafts as a basis for E module endorsement.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
448	Swiss Aviation Maintenance Association SAMA/SVFB	<p>General Point 2.1 Too complicated, there is no simplification noticeable. E.g., Appendix II to AMC to Section 6 of Appendix III to Annex III There is a lack of a credit system for “dual education systems” as used in Germany and Switzerland Not all new technologies must / should be implemented in the basic training, only those that are widely used, otherwise these are to be trained via type training. There is a lack of revision of outdated topics, such as wooden structures - such topics should only be trained for people who still work on wooden structures, which is a minority nowadays. It could also be solved by a special Licence as used in Switzerland for Metal Sheet workers and Specialists on Composite (S-Licence)</p> <p>General Point 2.2 Modules 18 lacks customisation options to match practical experience. The scope and implementation of the practical assessment is set far too high (up to 5 days of assessment is irresponsible and not justified, not to mention the costs). General Point 2.3 (c) SAMA has brought concerns to the working group, that students coming from a Part-147 ATO and having passed the practical skills provided by the ATO are showing a large backlog versus a student having received their basic practical skills from an approved MRO or by an APPRENTISHIP or vocational training as provided in Germany or Switzerland. It is therefore not understood, why a 147 should be able to test practical skills of such person having passed the exams of an apprenticeship (vocational training), when a 145 is not satisfied with some students are coming from a 147 approved MTO only.</p> <p>General Point 2.4 The description of the scope and content of the OJT is insufficient on the part of EASA. The industry concludes that there is a lack of a guideline that would allow for standardisation, which means that there is a danger that the revised OJT will have the same / similar problems as the existing one. This endangers the overall acceptance of OJTs.</p>	Noted.
449	Swiss Aviation Maintenance Association SAMA/SVFB	<p>66.A.5 Aircraft groups Many different categories already exist. The creation of new categories is seen as critical if it does not result in a corresponding added value. There is a need to integrate new technologies into existing groups, not to create additional groups with different nomenclatures.</p> <p>GM 66.A.5 Aircraft groups The industry asked years ago that the number of licence categories be reduced to have a simpler, more efficient licensing system. This need should be considered in a revision of Part-66. B3 and B2L are to be revisited whether they are worth making it complicated? A special remark concerning Flight Level 290 is unnecessary on our part. The decisive factor is whether the type is complex and whether it is equipped with a pressurised cabin. In this way, a simplification of the regulations can be achieved. Otherwise, future discussions will quickly be</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		extended to the subject of oxygen, which is to be handled very differently depending on the country and airport.	
450	Swiss Aviation Maintenance Association SAMA/SVFB	66.A.20 Privileges Since checks are equalised into E-Check as Line Maintenance (with certain Base Maintenance Tasks hidden) it could be considered to eliminate the C-Licence in its entirety. Extend for the B1 and the B2 the privilege and allow working together with support staff.	Not accepted. However, the elimination/combination of the existing licences is not within the scope of the RMT.0255. This will be discussed in another RM action.
451	Swiss Aviation Maintenance Association SAMA/SVFB	66.A.25 Basic Competency For us, there is a lack of clear definitions in terms of soft skills such as attitudes and behaviour; these must be specified by the regulator. 66.A.25 (a) The industry doubts that it makes sense to provide for the NAAs as test centres. This will hardly be possible in large parts of EASA, as barely any NAA has the resources to be able to compile questionnaires in sufficient quantities in all national languages on the existing licence categories. If this is nevertheless desired by EASA, the industry assumes that Part-147 companies will concentrate on training and delegate the expensive exams to the NAAs, which will lead to additional costs in the industry due to time transfers alone. 66.A.25 (b) This text makes no sense of EASA's intention to simplify EASA regulations. The industry urgently requests EASA to draft its Part-66 in a simple, understandable language form. The key point here is not only the pure comprehensibility but much more the existing potential for misunderstandings and unnecessary interpretations on the part of our NAAs. 66.A.25 (c) as referenced under General Point 2.3., this is helping neither the industry nor the Competent Authorities as we have experienced the reverse situation, that a future B1 or B2 having received the Basic Practical Training in a 147 Training Organisation needs special attention to reach the professionalism of a diploma holder of a vocational training in Switzerland especially coming from a Part-145 organisation. 66.A.25 (d) The industry urgently requests EASA to issue clear guidelines on acceptable credits for Module 18 and Practical Assessments, otherwise it is feared that the European Aviation Maintenance Industry will end up far away from necessary standardisation. 66.A.25 (g) On the part of the industry, it is incomprehensible why module certificates are required to obtain a Cat C licence. Either a Cat B licensed person continues their education, or a person who comes from university. Cat B's no longer need modules and accepted university graduates have clear requirements about their educational path. It is obvious that this is mainly an administrative position, which requires basic technical knowledge of aircraft maintenance. However, this refers to maintenance activities and not basic knowledge. Attending basic modules as a legal requirement is an expensive matter without added value, which is why it is requested to waive this passage.	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
452	Swiss Aviation Maintenance Association SAMA/SVFB	<p>66.A.30 Basic experience requirements We are of the opinion that an oversight has sneaked in here. In our opinion, it would be correct if university graduates had to prove 12 months of practical experience and B2 6 months and not vice versa, since B2 already has considerable maintenance experience. This text should be dealt with in a tabular form. The chosen text form is confusing and misleading. It is feared that this text will create a broad basis for interpretation on the part of the NAAs, which cannot be the aim of a regulation. 66.A.30 Basic experience requirements 5. Higher education is an unspecified legal term which must be avoided. Higher education can be almost anything. With this term, a basis is created in Europe with which the most diverse training standards are regarded as equivalent, which can then lead to massive quality problems in aviation. 66.A.30 Basic experience requirements (g) There is a lack of clarification of the consequences, such as a reduction in the duration of the course. AMC 66.A.30(a) Basic experience requirements We refer to the above comments at least 6 months for B1/B2 and not 12 months. It can't be that people who have been working in aviation for years, who have been trained thoroughly, need more experience than university graduates. GM 66.A.30(a) Basic experience requirements At least 12 months for academic degree for Cat C and not 6 months, as aforementioned EASA is kindly requested to specify the text more precisely, as an "as well" will allow such a wide range of work, if accepted by the NAA, that ultimately military experience is still not fully accepted. Thus, this text is not coherent in itself and, in our opinion, needs to be revised. Furthermore, it lacks a correct and easily understandable table, instead of the text. GM 66.A.30(e) Basic experience requirements The question for us is whether the national authorities have a guideline according to which they can assess an "equivalent experience"? Within the member states, there are countries that know training periods of 6 months and others that estimate 4 years and more for a vocational apprenticeship. It seems obvious to us that these different training paths result in different knowledge and skills. Accordingly, the proposed text is not sufficient for us to be able to distinguish correctly between the different "experiences", in which we see the danger of unequal treatment of people with greater training. AMC 66.A.30(e) According to the comment above, we see deficient information. What exactly is acceptable and what is not? Are only individual tasks acceptable? What time is credited? or only percentages of the time? Due to the lack of a definition, it is feared that interpretation and handling will vary from NAA to NAA, which is why the industry needs clear guidelines from the NAAs on what is meant by "acceptable", so that individual countries do not have to suffer from higher requirements.</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
453	Swiss Aviation Maintenance Association SAMA/SVFB	<p>66.A.45 Endorsement with aircraft ratings We do not understand why a B1 needs module E, because this is not necessary for the B2.(i) In our view, the introduction of Module E is premature, as only a limited number of aircraft have used this technology so far and a widespread use is not foreseeable. Furthermore, we are of the opinion that the introduction of a new category is launched when this technology is only applicable to individual licence categories. In our view, this is not basic knowledge, but type-specific knowledge, which has been incorrectly assigned here. Accordingly, we find fault with EASA's approach.(h) For reasons of correct calculation of an examination result, we reject the specification of 10 questions. Those who get 8 questions right pass with 80%, those who get 7 questions right fail with 70%, which means that a pass result of the 75% required by EASA is not possible. If this test were to be applied, a number of 8 questions would have to be set.GM 66.A.45 Endorsement with aircraft ratings For us, the specification is missing that, in the case of a new sub-category, all tasks that were included in the previous scope do not have to be tackled again. This has been a logical step for some, but unfortunately not by far all NAAs, which is why this addition / clarification will mean relief from duplication for many companies.AMC 66.B.115 (c) Procedure for the change of an aircraft maintenance... The nomenclature "adequate" is not considered suitable here. For us, this is an undefined legal term which will lead to fundamentally different practices within the member states and will thus largely distort competition. On the part of the industry, EASA is therefore asked to rigorously eliminate such ambiguities and to use only specific legal terms.66.B.400 GeneralAccording to our understanding, EASA is obliged "to assure a level playing field throughout the industry and states". Thus, it must be prevented that the individual NAAs in individual member states can contradict this principle through self-created "additional burdens". We see this delegation to the competent authority as a violation of EASA's mandate, unless a clear guideline is given to the NAAs for application. Standardisation is a goal and will help to eliminate different interpretations by the Competent Authorities as experienced by multiple MROs making business throughout Europe (especially in Business and General Aviation!)</p>	Noted. The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
454	Swiss Aviation Maintenance Association SAMA/SVFB	<p>APPENDICES TO ANNEX III (PART-66) Appendix I - Basic Knowledge and Practical assessment requirements (except for Category L licence) In our opinion, the text is incorrect. We see a module 12 for B2 and B2L as a misstatement of the text.We do approve the idea of transferring significant parts of the text to the AMC, but come to the conclusion that readability has suffered greatly as a result. One cannot speak of a simplification of Part-66 if the reading is increased back</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>and forth between IR, AMC,.... Therefore, this is neither considered expedient nor practicable. We propose that the entire text be transferred to the AMC and that a page-filling collection of headings be dispensed with, as this definitely does not generate any added value. Cyber security is covered in Module 5.16 and Module 10. This is not perceived as harmonisation. We propose that this topic be dealt with in one module only. Regarding Module 18 Practical Assessment, we conclude that discrepancies have been created in the allocations. EASA thus ignores the fact that proof of practice on the aircraft is required to a considerable extent, so that poor practical training per se should not be possible, as these are in daily use in maintenance. On top of that, there are additional safety barriers such as the Initial Competence Assessment (ICA), which every Part-145 operation must carry out before anyone wants to work without (or with reduced) supervision. And there is also Task Training for Cat A and OJTs for Cat B. The industry seriously doubts that it is really necessary on the part of the regulator to add another "safety barrier" here. Furthermore, we perceive that the assessment as such lacks a structure which is correctly integrated into the school structure of the training according to EASA. Manuals such as AMM, SRM, ... are taught in the modules as basic knowledge. While simple work can be done correctly with this knowledge, this knowledge will not be sufficient to correctly handle complex tasks in the areas of B1 and B2, as many documents are nowadays very type-specific. As an example, a graduate of the Basic Module will hardly ever be able to correctly read and interpret a modern SRM of Airbus Industries. This SRM knowledge is only acquired in the type course. We therefore consider it fundamentally wrong that assessment requirements are based on points which do not have to be available as knowledge at the time of assessment.</p>	
455	Swiss Aviation Maintenance Association SAMA/SVFB	<p>AMC to Section 2 of Appendix I to Part-66-Modularisation On the part of our industry, we are of the opinion that its revision of Part-66 also requires harmonisation in the other Parts, here in particular to Part-145. Thus, we come to the conclusion that 9.9 is now anchored in Module 9 and in Part-145. On the one hand, this is a duplication without added value, and on the other hand, it is a Part-145 issue, as this is company-specific. We therefore request that all training points which may have company-specific features be left in Part-145 and rigorously removed from Part-66. We therefore request that Module 9, as well as all other modules, be fundamentally reviewed again. Similar to our comment above, we urge EASA, with all due courtesy, to remove 10.08, 10.09 and 10.10 from the Part-66 training catalogue. We do welcome the provisions given in 3. Basic training methods, but at the same time criticise the fact that attention has been focused solely on WBTs/CBTs. In our view, this is a defined learning</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		standard which must be universally valid, i.e., also binding for classroom teaching.	
456	Swiss Aviation Maintenance Association SAMA/SVFB	<p>APPENDICES TO ANNEX III (PART-66) Appendix II - Basic examination and assessment standard (except for category L licence) The exam problems in this regard are extensive and have been known for a long time. In our view, splitting exams is a perfectly viable and sensible way forward, although setting a maximum number of exam questions at 100 would provide a far more sensible solution. It is a mistaken assumption that with more than 100 questions, a student's knowledge is better tested. Anyone who can answer at least 75 of the 100 questions correctly has understood each module, however immense it may be. More questions are only more expensive and more stress for the examinee. Therefore, our demand is a limitation to a maximum of 100 questions instead of splitting exams. If EASA cannot bring itself to follow a sensible limitation of a question catalogue, splitting exams are the only logical consequence. In this case, however, the individual listing of partial exam results and the requirement to pass each partial exam should be abandoned immediately. This restricts competition and creates unnecessary administrative burdens. It should be noted that persons with a splitting exam will have to take shorter exams at a time, but will be assessed much more strictly, for which there is no corresponding handling in the EASA regulations.1.13 Even though the old text has often led to ambiguities, we still see it as much better than the new proposed definition. What happens if someone takes an examination every year, is the waiting period then also 1 year? What happens after 3 attempts? or, what happens if 3 attempts are completed in 13 months? We don't see any real added value for the industry in all these restrictions. Basically, every person / every company has to decide for themselves how big the investment is for obtaining a licence. Whether the knowledge was finally achieved in the first or the hundredth attempt is secondary. What is important is that the knowledge is finally obtained. We therefore request that these artificial restrictions / limitations be lifted.As noted above, we conclude that a table with only headings is not useful for us. We therefore request the complete transfer to the AMC.Module 18 - Practical Assessment - while we have already stated that this module generates little to no benefit and has not been properly embedded into the training landscape, we also cannot help but strongly criticise the proposed duration. It is incomprehensible to us how an OJT assessment can be carried out in one day without any problems, but the examination of basic skills should then extend over such a lengthy time frame. We strictly point this out and call on EASA to limit Cat A assessments to half a day and Cat B assessments, if they are unavoidable. Such long assessments,</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>as proposed, do not produce better/more accurate results, but are many times more expensive and expose the person to be assessed to almost limitless stress, which cannot be justified in any way.</p>	
457	Swiss Aviation Maintenance Association SAMA/SVFB	<p>APPENDICES TO ANNEX III (PART-66) Appendix III - Aircraft type training and examination standard - On the job training We cannot support the reference to the Operational Suitability Data. This should only be done if the OSD is available and easily obtainable. Currently, we see the situation that only a few prototypes have a usable OSD and that additional compilations are a long way off. In addition, the free availability of the OSDs mentioned is in no way foreseeable on the part of the manufacturers. Therefore, we consider the reference to the OSD made here by EASA as not useful and difficult to implement and therefore request its deletion. The approval for aircraft type training by the MBT method is welcomed. The pandemic situation has shown that this form of training has proven its worth in times of crisis. However, since the revision should also take into account future development steps as far as they are foreseeable, in our opinion the next step, namely that it must also be possible to conduct examinations remotely, is a central step into the future. For us, the proposed step is a step in the right direction, but it cannot be concluded in this way. Through the separate possibility of obtaining theory from provider A and practice from provider B, the theory must form a self-contained product. Thus, distance learning must also offer the possibility of a distance examination. 4.1 The number of questions for Type Training belongs to Part-147. This is not correctly placed in Part-66. We therefore request that this text be removed from Part-66 and integrated into Part-147. Regarding the assessor, we come to the conclusion that there is no good reason why a person who has acted as a mentor should not generally also be allowed to carry out the assessment. On the one hand, no fraud can be prevented with this measure, on the other hand, each company must explain who is allowed to act as assessor and this person must also fulfil selected criteria. Adding another hurdle now is cost-intensive without any added benefit. By comparison, any mechanic who is authorised to do so may also release his work. But a mentor is not allowed to carry out an assessment after mentoring? We see this as an unnecessary restriction and complication of the requirements without being able to achieve a positive effect. Even more, it is to be understood as a vote of no confidence. We therefore request that these restrictions be removed in their entirety. 6.5 OJT assessment - We do not see why a mentor should recommend an assessment. The mentor confirms with each individual signature (per task) that the work was carried out properly and that the necessary soft factors such as attitude, situation awareness, etc. were present to</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>a sufficient degree. Therefore, there is no reason, even remotely comprehensible, for an extension of the administrative papers in which a mentor makes a recommendation, especially since every mentor is aware that the trained person can be assessed on the respective task. We therefore request that the mentor recommendation be completely removed from this text.6.6 Compliance Report and OJT Certificate - Industry does not agree with the proposed extension of the paperwork to be administered. Since OJTs must be approved and consequently a list of tasks approved by the NAA must be completed, this is carried out by a qualified mentor who confirms the work carried out step by step and then a review takes place in the form of an assessment (approved assessment form!), a consistent, comprehensible system is in place. It is completely incomprehensible why an OJT certificate, a compliance report, a trainee certificate, etc. should be required. We therefore ask EASA in the politest way to limit the documents required for OJTs to the logbook, the assessment sheet and a confirmation (hard copy or digital) issued by the organisation carrying out the OJT on the time frames observed.6.7 Records - We kindly ask EASA to refrain from referencing Part-145 relevant topics, which are anchored in Part-66, to Part-147. This is the wrong standard and not applicable here. Furthermore, such an approach is definitely far removed from EASA's goal of simplification.</p>	
458	Swiss Aviation Maintenance Association SAMA/SVFB	<p>AMC to section 1 of Appendix III to Part-66 Aircraft Type Training and examination standard - On-the-Job Training (c) (iv) Differences Training - It is our understanding that a training that has led to a licence entry is not subject to an expiry date. This should also be correctly incorporated here. For example, graduates of an aircraft type course B1 and B2 would not have to attend the type training again for a later, additional category (B2) in order to obtain a B1 licence. Not even as a difference training. On the one hand, all the necessary basic knowledge has been acquired through module courses, and on the other hand, the required technical type training is completed via the OJT of the first type entry, which must still be completed. Accordingly, the completion of a new type training is neither purposeful nor enriching, but can be identified as a cost driver, which is why we see the need for clarification here</p>	Noted.
459	Swiss Aviation Maintenance Association SAMA/SVFB	<p>AMC to section 6 of Appendix III to Part-66 Aircraft Type Training and examination standard - On-the Job Training6.4.1 and 6.4.2 General and Personnel requirements - On the part of the companies we refuse to accept that it should be the assessor's task to evaluate the scope and diversity of the work carried out. On the one hand, this is practically not a task of the assessor in any company (quality, training, ...). It must be possible to assign this to a suitable position</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>within a company. Secondly, this raises the question of why an NAA-approved syllabus is needed if it is necessary to assess each time whether the required depth of knowledge has really been achieved by working through the approved syllabus. If there is a need for an approved syllabus, this step is unnecessary, which is why we hereby request the removal of this requirement.6.4.3 OJT content - On the part of the industry, the given content is rejected. The point on shift-handover procedures and team co-ordination shows that text passages from Part-145 were borrowed here to a considerable extent. As a result, the same criteria as in the Initial Competence Assessment (ICA) are now to be checked in the OJT Assessment. On the one hand, this is a duplication without added value, and on the other hand, it means that Part-66 interferes with the concerns of Part-145, since a shift-handover can be different in each individual Part-145 organisation. This created a not insignificant problem. Since OJTs must now be approved by the respective NAA and accepted by all other NAAs, individuals are permitted to change employers during the OJT and complete the started OJT syllabus, which must then be fully accepted. This is even though the shift-handover no longer fits the new company. We therefore come to the conclusion that the OJT assessment criteria must be reworked, and all 145 company-specific points must be removed.It is not at all clear to us from where, i.e. according to which regulatory principle it was determined that "ideally" 50% of the tasks should be carried out in a base maintenance, since there is no difference in licences for B1, B2 or otherwise about the use in a line or base maintenance. It should also be noted that a considerable number of companies operate with a limited base maintenance approval only. If they can still provide the necessary training for an OJT, we do not believe it is acceptable for the regulator to require them to work in another organisation to complete tasks. No one should have to pay for external training when the same work is done in-house. We therefore conclude that this requirement is incorrect and unreasonable, which is why we request its deletion.In our opinion, group tasks should be based on general training practice and be set at 6 persons instead of 3 only. As a comparison, we refer to aircraft type training, where EASA allows up to 15 persons to one instructor, which is even a considerably higher number. Accordingly, a limitation to only 3 persons is seen as too low and distorting established standards. In addition, it is desired that complex tasks can also be tackled as group tasks (no one can change large engines alone and, after all, group work must also be practised correctly).At the end of the performance of the OJT, a compliance report...This has been commented on and set out previously. We request the deletion of this paragraph</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
460	Swiss Aviation Maintenance Association SAMA/SVFB	Appendix II - Aircraft Type Practical Experience and On-the-Job Training - List of Tasks With this Part-66 proposal, points (tasks) are required which are already required in Part-145 of the Initial Competence Assessment (ICA). For us, it is incomprehensible why points should now be tested / carried out twice and we therefore fundamentally reject this. For us there are two possibilities All work which is also ICA relevant shall be removed from Part-66 with immediate effect, or Part-145 ICAs are to be credited accordingly. We do not see the table as such as practicable, as comparability is hardly possible, which in turn prevents the emergence of a European standard. The idea of working with generic tasks, as proposed by EASA at the time, can at best be described as a failure. For our part, we therefore argue that templates of type-specific OJTs are inevitable. Manufacturers and AMOs must define the basics of a type-specific OJT, which is then released as a syllabus by EASA. In this way, EASA can implement a European standard that is really feasible and can be supported by all NAAs.	Noted.
461	Swiss Aviation Maintenance Association SAMA/SVFB	147.A.135 (d) This passage should be deleted in its entirety. All the requirements are set out several times in other articles, so there is no need to reiterate them here - we do not see reiterating the same thing in different places as simplifying or improving any regulation.	Not Accepted.
462	Swiss Aviation Maintenance Association SAMA/SVFB	Quality (Personal Experience) As a participant of the RMT.0255 working group I found that the WEBEX meetings during the COVID-19 pandemic were not as effective as the physical meetings at EASA headquarters. In parallel I worked on the Anybody's CAE together with FOCA and was therefore not as focused as I would have been coming to Cologne. Drafting legislation exclusively by means of WEBEX meetings is rather suboptimal, especially when such a deadline pressure is on a working group as in our case. I am actually surprised at how the working group's draft changed up to the NPA – in fact, another working group meeting would have to be held to review and evaluate the introduced changes. This would, of course, lengthen the process.	Noted.
463	Swiss Aviation Maintenance Association SAMA/SVFB	(SAMA/ECOGAS) This consultation will not necessarily simplify all of Part 66 but, on the contrary, make it even more complicated by adding more special cases and/or more specifications. (SAMA) When changes are made to a law or regulation, it would be useful to make them easily readable and interpretable, always with a view to standardisation (between authorities) and ensuring a high level of safety in aviation. Where a risk-based approach is envisioned, a good guidance would many times be helpful for the industry as well for the regulators. (ECOGAS) Furthermore, the consultation did not consider the shortage of ground engineers and technicians across the aviation industry, in particular for SMEs, the General Aviation Sector and the Helicopter Sector, as demanded during the 2016	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		EASA workshops. (SAMA/ECOGAS)Perhaps in some countries the training system should finally be adapted so that, in the case of craft occupations (as in others), the "crafts" predominates rather than the "school", which may even benefit young people who are tired of school at the age of 16. We need people who can use their hands and who already have a good foundation at 21 years to perform practical work professionally. (Personally, by own experience) It does not always have to be a bachelor's degree where there is no job waiting for you after a degree. This tip applies not only to governments, but also to parents.	
464	Savo Vocational College/ Aircraft Maintenance Training	<b>Page 52</b> ; 7.15 Welding, brazing and agglutination should be included in module 7 syllabus <b>Page 57</b> ; 10.7"General understanding of Part-M, Part-ML Part-CAMO", PART-CAO should be added" <b>Page 87</b> ; 1,4 In PART66 syllbus 7.21 Documentation & Communication: elements and criteria for writing of work reports, troubleshooting reports and shift handover instructions. Communication: clear, comprehensive and concise. Student's ability to communicate and make reports can be assessed solely in MOD7. Essay question is not necessary in MOD10. Pages 63...64; 11.19, 11.20, 11.21 The description of sub-modules goe too deep in details. This should be rephrased to cover topics in general manner, which doesn't exclude some aircraft manufacturers	page 52: not accepted, page 57: Accepted; missing Part-CAO to be added. page 87: new M7.21 takes away the need for Essay in M10, Accepted. NPA pages 63-64 (11.19,11.20,11.21): Not accepted, the AMC covers generic systems.
465	Finnish Transport and Communications Agency Traficom	CAA-FI requests more information about these two scenarios. Is it intended to separate OJT completely from the first type rating? Is it then performed before certification authorisation but after type training and 66 licence endorsement? In any case, CAA-FI consideres that we should not have duplicate OJT approval process, first at 145 side and then verify OJT contents when issuing 66 licence.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
466	European Aviation Maintenance Training Committee	The NPA has not provided any indication of an implementation period once this NPA is passed EU commission. As we do appreciate an expeditious implementation of the new Part-66, an extended transition period for Appendices I and VII are required to produce the required learning materials. Many independent school having problems getting the new technology stuff, respectively information which is not released yet, i.e. EASAs requirements on cyber security for M10.Also the New task system for OJT is going to have huge impact on existing OJT Programs.An implementation period of sufficiant duration is absolutely vital.	Grace periods will be introduced in the cover regulation to permit a smoother implementation of the changes introduced to Part-66.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
467	Finnish Transport and Communications Agency Traficom	2.4 c): Level of knowledge in B1 and B2 modules should be the same (only one basic knowledge syllabus for B1 and B2 licenses) 2.4 e): There are already FES-sailplanes. Grandfather rights must be granted for those licence holder working with FES-planes as a certifying staff. So no requirement for examination for those persons.	2.4 c) Not accepted. 2.4 e) Comment unclear.
468	Finnish Transport and Communications Agency Traficom	2.1: Part-66 license system is too complex. There are too many license categories and subcategories. B1 and B2 categories should be put to one category. L-license should be a separate license with its own license form. 2.1 c): Requirement for practical assessment in L-license is too heavy. 147-organisations are not interested in L-license and the competent authority is not able to provide practical assessments.	Noted.
469	SFF, Svensk Flygteknikerförning (Assoc. of Swedish Licensed Aircraft Engineers).	Page 62.4.(b) Proposed changes to the OJT program are supported by SFF. SFF strongly disagree with the conclusion that the proposed forced mutual recognition of the OJT has no drawbacks. This is a considerable risk and it may jeopardize the recognition of the licence. (c) Adding the practical skills assessment will improve the competency level, especially among self-trained students. A well known problem in the industry. (d) The proposed amendment of the AMC is supported by SFF. Page 72.4.(e) Extending the scope of current licenses is a good way of introducing Group E rating.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
470	Tampereen vocational college TREDU	Page 30 MODULE 7 MAINTENANCE PRACTICES 7.15 a) Soldering methods; inspection of soldering joints 7.15 b) Preparation of aircraft for weighing; Aircraft weighing. /* Style Definitions */ table.MsoNormalTable Proposal Propose to integrate existing 7.15 a) integrate to Mod. 7.7, and integrate 7.15 b) to 7.14.1.) Comment Soldering is one of core work in EWIS (7.7) and Welding is more B1 work with sheet metals. Page 54 - MODULE 8. BASIC AERODYNAMICS Proposal B3 and B2L should be the same level. Comment B3 and B2L aerodynamics knowledge should be almost same. Page 57 - 10.5 Air Operations 10.7 Continuing Airworthiness Proposal Add to 10.7: "General understanding of Part-M, Part-ML Part-CAMO, and PART-CAO." Comment- Page 60-62 - 11.5.2 Avionics Systems 11.9 Flight Controls (ATA 27) b) 11.19 Integrated Modular Avionics (ATA 42) Proposal 11.5.2 MLS should be removed. 11.19 Add Overall system description and theory, Typical system layouts Comment 11.5.2 / Obsolete and non used system. Egnos / Waas will cover. New technology and already in use. 11.19 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core	Page 30 MODULE 7 MAINTENANCE PRACTICES 7.15 a) Soldering methods; inspection of soldering joints 7.15 b) Preparation of aircraft for weighing; Aircraft weighing. Proposal: Propose to integrate existing 7.15 a) integrate to Mod. 7.7, and integrate 7.15 b) to 7.14.1.) EASA answer: Not accepted. 7.15 is reserved without content. Soldering is one core work in EWIS (7.7) and should remain there. Aircraft Weight and Balance is already 7.16.  Page 54 MODULE 8. BASIC AERODYNAMICS Proposal B3 and B2L should be the same level. Comment B3 and B2L aerodynamics knowledge should be almost same. EASA answer: Not accepted. B3 is a light version of B1 and B2L is the light version of B2; this means that B2L requirements need to be moved to the where A1, a2, A3, A4, B3 are listed (lower level) to be consistent.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>system with data busses.</p> <p>Page 68 - MODULE 12. ROTORCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS 12.11 Fuel Systems (ATA 28) Proposal 12.17 Add Overall system description and theory, Typical system layouts Comment 12.17 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core system with data busses.</p> <p>Page 75 - MODULE 13. AIRCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS Proposal 13.20 Add Overall system description and theory, Typical system layouts Comment General comment to the Module 13 submodules. Why so many submodules are divided to a), b), c) etc. ? This make level structure quite complex and will effect to questions too (see our comments AMC Appendix II / MOD 13) . We recommend to use similar submodule structures than used in Module 11 and 12. 13.20 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core system with data busses.</p> <p>Page 84-85 - MODULE 18. PRACTICAL ASSESSMENT Proposal Add the following for B2 &amp; B2L licence : 1. EWIS Cable and connector work 2. Radio communication testing 3. Radio Navigation testing ILS / VOR / RNAV 4. Pitot static testing 5. Soft Ware upload / down load / testing example : Cabin equipment testing NAV database loading 6. Autopilot testing 7. Troubleshooting for system failures including schematics and wiring manual reading using MCDU and system diagnostics Comment Current MOD 18 proposal consist mainly A and B1 working tasks. MOD 18 should include B2 working tasks for B2 and B2L self studied candidates. Especially some main Avionic tasks should be described, like electric measuring, troubleshooting, instruments/meters, navigation, communication and etc.</p> <p>Page 87 and 88 - 1.4 Essay questions Proposal Remove all assay questions. Comment Introduction of 7.21 Documentation &amp; Communication, as well as Module 18 E. Documentation and communication: — Use of the applicable documentation; — Writing of work reports, aircraft technical logs and troubleshooting reports; — Demonstration of good oral and written communication during shift handover; — Demonstration of clear and comprehensive communication with colleagues. Was suggested as a way to eliminate essay questions altogether by ensuring the candidate can communicate in a clear and concise manner in relation to actual work performed and not academic topics.</p>	<p>Page 57 10.5 Air Operations 10.7 Continuing Airworthiness Proposal Add to 10.7: "General understanding of Part-M, Part-ML Part-CAMO, and PART-CAO. EASA answer: Accepted: Part-CAO is missing.</p> <p>Page 60-62 11.5.2 Avionics Systems 11.9 Flight Controls (ATA 27) b) 11.19 Integrated Modular Avionics (ATA 42) Proposal 11.5.2 MLS should be removed. Comment 11.5.2 / Obsolete and non used system. Egnos / Waas will cover. New technology and already in use. EASA answer: Accepted: 11.5.2 is removed.</p> <p>11.19 Add Overall system description and theory, Typical system layouts. 11.19 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core system with data busses. EASA answer: Accepted: 19 Add Overall system description and theory, Typical system layouts.</p> <p>Page 68 MODULE 12. ROTORCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS 12.11 Fuel Systems (ATA 28) Proposal 12.17 Add Overall system description and theory, Typical system layouts Comment 12.17 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core system with data busses. EASA answer: Accepted: (for consistency with 11.19): Add Overall system description and theory, Typical system layouts.</p> <p>Page 75 MODULE 13. AIRCRAFT AERODYNAMICS, STRUCTURES AND SYSTEMS Proposal 13.20 Add Overall system description and theory, Typical system layouts Comment General comment to the Module 13 submodules. Why so many submodules are divided to a), b), c) etc. ? This make level structure quite</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Page 127, 129-131 - 13.2 Structures — General Concepts 13.11.2 Air conditioning 13.12 Fire Protection (ATA 26) 13.13 Fuel Systems (ATA 28/47) 13.14 Hydraulic Power (ATA 29) 13.15 Ice and Rain Protection (ATA 30) 13.16 Landing Gear (ATA 32) 13.18 Pneumatic/Vacuum (ATA 36) Proposal Number of questions for B2 and B2L to be adjusted. Question amounts should be combined to bigger groups. Not one by one for every sub-sub items. ref. 13.2, 13.11.2, 13.13, 13.14, 13.15, 13.16, 13.18, See a good example of distribution in 13.10 Onboard Maintenance Systems (ATA 45) and 13.20 Integrated Modular Avionics (IMA) (ATA 42) and MOD 11 &amp; 12 question structure. Comment Should be at least the same number of MC questions as B2. If a student has done all B2L system exams he should be able to do a Delta M13 to become B2: but counting the questions for this exam we need 29 MC questions and this is not dividable to 4 so we need more questions.</p>	<p>complex and will effect to questions too (see our comments AMC Appendix II / MOD 13) .                      We recommend to use similar submodule structures than used in Module 11 and 12.                      EASA answer:                      Accepted: (for consistency with 11.19, 12.11): Add Overall system description and theory, Typical system layouts.</p> <p>13.20 / Current tasks goes too direct to detail issues without any basic theory and system background. Without system basics is difficult to describe how the functional units are connected together in core system with data busses.                      EASA answer:                      Accepted: (for consistency with 11.19, 12.11, 13.20): Add Overall system description and theory, Typical system layouts.</p> <p>Page 84-85 MODULE 18. PRACTICAL ASSESSMENT                      Proposal Add the following for B2 &amp; B2L licence :</p> <ol style="list-style-type: none"> <li>1. EWIS Cable and connector work</li> <li>2. Radio communication testing</li> <li>3. Radio Navigation testing ILS / VOR / RNAV</li> <li>4. Pitot static testing</li> <li>5. Soft Ware upload / down load / testing example : Cabin equipment testing NAV database loading</li> <li>6. Autopilot testing</li> <li>7. Troubleshooting for system failures including schematics and wiring manual reading using MCDU and system diagnostics</li> </ol> <p>EASA answer:                      Accepted. Items 1 and 4 are part of B1 privileges as well, B2 kicks in for troubleshooting. B2 and B2L tasks will be better defined in the final AMC &amp; GM.</p> <p>Comment Current MOD 18 proposal consist mainly A and B1 working tasks. MOD 18 should include B2 working tasks for B2 and B2L self studied candidates. Especially some main Avionic tasks should be described, like electric measuring, troubleshooting, instruments/meters, navigation, communication and etc.                      EASA answer:                      Accepted: B2 and B2L tasks will be better defined in the final AMC &amp; GM</p> <p>Page 87 and 88 1.4 Essay questions</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>Proposal Remove all essay questions.                      Comment: Introduction of 7.21 Documentation &amp; Communication, as well as Module 18 E. Documentation and communication: — Use of the applicable documentation; — Writing of work reports, aircraft technical logs and troubleshooting reports; — Demonstration of good oral and written communication during shift handover; — Demonstration of clear and comprehensive communication with colleagues.                      Was suggested as a way to eliminate essay questions altogether by ensuring the candidate can communicate in a clear and concise manner in relation to actual work performed and not academic topics.                      EASA answer:                      Accepted: the way to improve learning objective of the essay is to introduce 7.21; then all aspects are verified in a real maintenance environment. To introduce 7.21 and not remove all essay questions is increasing the knowledge load instead of improving the learning objective of 7.21.</p> <p>Page 127, 129-131 13.2 Structures — General Concepts                      13.11.2 Air conditioning                      13.12 Fire Protection (ATA 26)                      13.13 Fuel Systems (ATA 28/47)                      13.14 Hydraulic Power (ATA 29)                      13.15 Ice and Rain Protection (ATA 30)                      13.16 Landing Gear (ATA 32)                      13.18 Pneumatic/Vacuum (ATA 36)                      Proposal Number of questions for B2 and B2L to be adjusted.                      Question amounts should be combined to bigger groups.                      Not one by one for every sub-sub items.                      ref. 13.2, 13.11.2, 13.13, 13.14, 13.15, 13.16, 13.18, See a good example of distribution in 13.10 Onboard Maintenance Systems (ATA 45) and 13.20 Integrated Modular Avionics (IMA) (ATA 42) and MOD 11 &amp; 12 question structure.                      EASA answer:                      Partially accepted: Subjects of M13 were redistributed.</p> <p>Comment should be at least the same number of MC questions as B2. If a student has done all B2L system exams he should be able to do a Delta M13 to become B2: but counting the questions for this exam we need 29 MC questions and this is not dividable to 4 so we need more questions.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			EASA answer: Accepted. Rebalance of questions for these listed groups is required, and keep in mind this example of Delta exams between B2-B2L vice versa.
471	IATA	Page 5/2582.3 How we want to achieve it — overview of the proposals The NPA outcome “as is” doesn’t seem to consider the Agency self-set target from ToR RMT.0255 (MDM.059) Issue 2 point 3(c) Introduction of competency-based training (CBT) principles in the maintenance training system and harmonisation with ICAO standards and guidelines. This NPA text does not make any direct reference to competency-based training (CBT). The use of the word “competency” which would suggest a Competency Based Training (CBT) approach when in fact the actual Part-66 and Part-147 are strictly structured on “knowledge and skills” requirements could create confusion and missperception. The Agency should consider prioritizing the Part 66 and Part 147 revision for offering also a robust reflection of CBT principles and use options – it is a stringent need of the aviation industry. This NPA could be an opportunity to consider/recognize the CBT elements/concepts presented in the ICAO Doc 9868 PAN Training Ed3 2020. With the Agency being closely involved in the ICAO developments envisaged by the recently established Personnel Training and Licensing Panel (PTLP) and while the Doc 10098 Manual on Aircraft Maintenance Personnel CBTA (Competency Based Training and Assessment) is soon to be released, we suggest that another round of Part-66 & Part-147 review should be timely considered for the near future (i.e. in the 2 years horizon).	Noted. The CBTA topic is discussed within RMT.0544 ‘Review of Part-147’.
473	IATA	Page 8/258 Specific request to stakeholders Please clarify the reference to 145.A.35 as “personnel requirements” which is the title corresponding to 145.A.30. Would both the a) and b) scenarios explored by the Agency imply that OJT will not be anymore a requirement for issuing the licence type rating (when it is the first rating in that aircraft category) under Part-66 (see GM 66.A.45 and Appendix III to Part-66, Section 6) but rather be kept as a requirement for exercising the licence privileges (i.e. in addition to 6 months experience in the last 2 years) ?	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
474	IATA	Page 8/258 Specific request to stakeholders The specification of training course durations is presently done for Basic Training (BT) in Part-147 (see Appendix I — Basic training course duration) and for Type Training (TT) in Part-66 (see Appendix III — Aircraft type training and examination standard — On-the-job training (OJT)). While this approach is a legacy one and pre-dates the present NPA, it could be perceived as lacking consistency since both the BT and TT could be approved as being within the scope of a Part-147 organization or could benefit of a direct (one-off) course approval by the competent authority and not necessarily under a	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		Part-147 organization approval. Should the duration provisions (i.e. BT and TT) be both hosted in Part-66?	
475	IATA	Page 11 / 258 GM 66.A.5 Aircraft groups The definition of Group 1, 2, 3, 4 and E included in 66.A.5 should be accurately reflected in the table of GM 66.A.5 as far as its essential elements. Suggest to replace the wording "Aircraft with electrical propulsion" with "Aircraft with electrical propulsion other than those in Group 1". Preserving the present wording in the GM table for "E..." may create confusion since it is expected that at least some of the electrical propulsion system aircraft would meet the Group 1 definition.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
476	IATA	Page 11/ 25866.A.25 Basic competency requirements The paragraph 66.A.25 is addressing through its provisions "knowledge" and "skills" requirements and not competency ones. Thus, with the proposed change from "knowledge" to "competency", the title would not be reflective of the content. We suggest using the title "66.A.25 Basic knowledge and skills requirements"	Accepted.
477	IATA	Page 11 / 25866.A.25 Basic competency requirements The introductory paragraph is potentially confusing when invoking "competency" which is in fact defined as being more than an SKA set. The competency definition adopted by ICAO in Doc 9868 is "Competency = A dimension of human performance that is used to reliably predict successful performance on the job. A competency is manifested and observed through behaviours that mobilize the relevant knowledge, skills and attitudes to carry out activities or tasks under specified conditions". Additionally, the context for use of competency is suggesting a Competency Based Training and Assessment (CBTA) which is defined in the same ICAO document as being "Training and assessment that are characterized by a performance orientation, emphasis on standards of performance and their measurement, and the development of training to the specified performance standards". This would require also a definition of Competency Standard (available from the same ICAO source). The 66.A.25 is in fact focused on "knowledge and skills" rather than "competency" in the sense mentioned above. Until such time that a clear CBTA path option would be offered in Part-66 we should be preserving the references to knowledge and skills with the respective examination and practical assessment for the process of assessing the knowledge and skills. We propose to consider the following introductory paragraph for 66.A.25: "The applicant for an aircraft maintenance licence, or for the addition of an aircraft category or subcategory in the aircraft maintenance licence, shall demonstrate by examination and practical assessment that they meet the knowledge and skill requirements"	Accepted. The term 'competence' will be removed in order to avoid confusion with the CBTA concept.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
478	IATA	Page 14/ 258GM 66.A.25(b)The GM title should preserve the 66.A.25 title wording and thus, for the reasons mentioned previously, we suggest the wording "Basic knowledge and skills requirements".	Accepted.
479	IATA	Page 14 / 258AMC 66.A.25The AMC title should preserve the 66.A.25 title wording and thus, for the reasons mentioned previously, we suggest the wording "Basic knowledge and skills requirements".	Accepted.
480	IATA	Page 18 to 20/25866.A.45 (i)The Module E elements defined in the 66.A.45 (i) and the corresponding AMC 66.A.45(i), would also be essential for seeking the aircraft type rating for a Group 1 aircraft which has electrical propulsion. Would the Module E elements be considered as implicitly ensured by the Type Training required for such Group 1 aircraft? (please see a previous comment suggesting to avoid any possible confusion due to the fact that it is expected that at least some of the electrical propulsion system aircraft would meet the Group 1 definition).	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
481	IATA	Page 141/2583. Aircraft type training standard (d) Justification of course durationThe revised text in paragraph (d) should recognize the competency based training (CBT) approach. Suggest to replace the respective existing text in paragraph (d) which states "Where the training needs analysis shows that more hours are needed, course lengths shall be longer than the minimum specified in the table" with the following: "Where the training needs analysis takes into account implementation of competency based training approaches and changes in training technologies and methods affecting directly the type training course undergoing the approval process, deviations from the minimum tuition hours specified by the table in point (c) should be considered by the competent authority. Justification of such deviations should be thoroughly scrutinised especially when seeking approval of durations shorter than the corresponding ones specified in (c)."	Not Accepted. CBTA principles have not yet been implemented in the Part-66/1-47 rules.
482	IATA	Page 250/258 147.A.200 Approved basic training course (g)In order to recognize a competency based training option, we suggest to change the present text from "Notwithstanding point (f), in order to benefit from changes in training technologies and methods (theoretical training), the number of hours as established in Appendix I (Basic training course duration) may be amended provided the syllabus content and schedule describe and justify the proposed changes. A procedure shall be included in the maintenance training organisation exposition (MTOE) to justify these changes" to  "Notwithstanding point (f), while observing the knowledge and skills requirements mentioned in 66.A.25 and benefitting from changes in training technologies and methods (theoretical training), the number of hours as	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		established in Appendix I (Basic training course duration) may be amended provided the syllabus content and schedule describe and justify the proposed changes. A procedure shall be included in the maintenance training organisation exposition (MTOE) to justify these changes”	
484	iAOPA Europe; Aufwind GmbH	The amendment of "pressurised aircraft" to classify aircraft into group 1 would not exclude the Cessna 400 Series, as they are (with some exemptions) pressurised and capable of operating above FL290. The Cessna 421 for example is certified for up to FL300 according to FAA TCDS A7CE. Thus, the Cessna 400 series and comparable aircraft would remain within group 1 unless individually reclassified into group 3. This is not in line with the idea expressed in the benefits of Objective a. Furthermore, the definition leaves room to ambiguity as seen on the certification flight levels of the Cessna 400 series. We suggest to remove the distinction of "pressurised aircraft capable of operating above FL290" and replace it with a classification into Group 1 for piston engined aircraft on case-by-case-basis. This is in line with the definition of group 3, that any piston engined aircraft the classification would be group 3 initially, except reclassified into group 1.	Noted. Definition of Group 1 has been changed in order to remove simple small piston engine aircraft. However, RMT.0731 will improve the definition of Group 1 adding conditions for electrical/hybrid aircraft and not conventional aircraft.
486	iAOPA Europe; Aufwind GmbH	As stated in GM 66.A.45, OJT is applicable not only to Group 1 aircraft, but also in every other group. Introduction of Part ML allows many owners to organise their airworthiness completely without the involvement of an AMO. This will lead to more Part-66 maintenance personnel working freelance as independent certifying staff. In our view, the education of technical staff within the aero clubs and private owner environment is an integral part of safety education of the stakeholders. We suggest to keep OJT within the scope of Part 66 and furthermore allow OJT courses to be taught outside of an AMO for Group 3 and Group 4 aircraft.	Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.
488	iAOPA Europe; Aufwind GmbH	Aircraft with electric propulsion have been certified for a long time among powered gliders, the Lange Antares being one example. Together with newer aircraft of other manufacturers and the popularity of the Front Electric Sustainer FES, several aircraft mechanics and owners already have experience in maintaining these systems. We propose that EASA grants the privileges of maintenance on group E aircraft to all aircraft mechanics / licence holders who have experience in maintenance of these aircraft without demanding an additional skill test.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
489	iAOPA Europe; Aufwind GmbH	On 66.A.5 (1):To reduce ambiguity and to achieve the objective a we suggest the wording: Group 1: complex motor-powered aircraft, helicopters, helicopters with multiple engines, aircraft equipped with fly-by-wire systems, gas airships other than ELA2 and other aircraft requiring an aircraft type rating when defined as such by the Agency. see comment on objective a	Noted. Definition of Group 1 has been changed in order to remove simple small piston engine aircraft. However, RMT.0731 will improve the definition of Group 1 adding conditions for electrical/hybrid aircraft and not conventional aircraft.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
490	iAOPA Europe; Aufwind GmbH	On 66.A.20:A license "with respect to" seems not to be used within the regulations framework so far. It appears to be overly complex and difficult to read. For instance, the category L licenses are named L1 to L5 and not "Category L with respect to gliders" or "Category L with respect to airships other than ELA2". Hence, introduction of the following distinction can provide clarity and ease reading of the regulation: 7. A category C aircraft maintenance licence shall permit the holder to issue certificates of release to service following base maintenance of the aircraft. The privileges apply to the aircraft in its entirety. The subcategory C1 includes subcategory C2. 66.A.3 would need to be changed: (g) Category C, divided into the following subcategories: - C1: Complex motor powered aircraft- C2: Other than complex motor powered aircraft	Not accepted. The intent of RMT.0255 was not to create additional categories.
491	iAOPA Europe; Aufwind GmbH	On 66.A.25(e):Especially for applicants with a university degree, providing evidence for knowledge requirements can be a very tedious task, as the university syllabus is not always worded in align with the knowledge requirements within this regulation. Hence it is suggested that the agency provides a list of knowledge credits that can be asserted by university level education, for example crediting aerodynamics, mathematics, aeroplane aerodynamics, structures and systems to an applicant holding a university degree in any aeronautical engineering discipline.	Not accepted. EASA is not in a position to provide indications/credits for each EU national education system. This is responsibility of the MS competent authority because they have the means to verify the equivalence between Appendix I and the contents of their national universities.
492	iAOPA Europe; Aufwind GmbH	On AMC 66.A.025:Following 66.A.25 (a)(iii), an organisation as agreed by the competent authority can conduct examinations for category L licenses. It is suggested, that these organisations should be given the certify the accomplishment of the practical assessment and be granted the privilege to issue the certificate of recognition (CoR): The successful accomplishment of the practical assessment should be demonstrated by a certificate of recognition (CoR) (EASA Form 148) of Appendix III to Annex IV (Part-147) issued by an approved Part-147 organisation, by the competent authority or in the case of a category L license, by the organisation conducting the practical assessment.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
493	iAOPA Europe; Aufwind GmbH	On 66.A.5 (5):This definition would place powered sailplanes with electric propulsion into group E. These aircraft are being maintained by regular maintenance personnel. For exsample, the Lange Antares has reached EASA type certification in July 2006. There has not been an issue with maintenance of these gliders since. Hence, we propose to keep the electric powered gliders within the scope of group 4. The definition of group E is suggested to be worded: Group E: aircraft with electrical propulsion other than those in Groups 1 and 4.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
494	iAOPA Europe; Aufwind GmbH	On GM 66.A.5:This table indicates, that the holder of a B1.2 or B3 license would not be certified to release work on powered gliders or gliders. rather he or she has to apply for an additional license (L1 / L2). Since Appendix IV states that for	Not accepted. It is necessary to specify that B1.2 and B3 do not include privileges on ELA1 aeroplanes other that piston engine.#



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		the inclusion of an L1/La license on basis of a B1.2 or B3 license does not mandate any for of training or examination, we think that the bureocratic act of issuing another license can be omitted and the B1.2 or B3 license shall be sufficient to release work on sailplanes and powered sailpanes of group 4.	
495	iAOPA Europe; Aufwind GmbH	On 66.A.30:Several tasks should not be performed first time on operating aircraft. The applicant to a license should learn certain tasks (e.g. how to perform a plywood or FRP repair) not on a critical aircraft part of an aircraft in service, but rather on a demonstrator. Hence, it is suggested to remove the requirement of practical maintenance experience on operating aircraft and exchange it for practical maintenance experience to aviation standards. This way, experience gained on demonstrators and non-operational aircraft will count in full towards obtaining the license and a student has more margin to experience errors (e.g. in destructive testing of repairs on models).	Noted. However, 66.A.30 - nature of the experience - was not part of RMT.0255 discussions.
496	iAOPA Europe; Aufwind GmbH	On 66.A.30(e):The change of regulation to only eventually accept maintenance experience gained outside an AMO, requires every aero club to become part of an AMO to train their maintenance staff towards a category L licence. Part ML explicitly allows aero clubs and private operators (i.e. non-commercial ATO and non-AOC use) to organise the maintenance of their aircraft with indipendend certifying staff (ML.A.201(f), ML.A.801(b), ML.A.901(b)). Especially within aero-clubs, technical training of new certifying staff has been performed under the supervision of the certifying staff and technical staff of the aero-club, without the necessity of becoming an AMO. Hence, the experience gained under supervision of certifying staff holding the aproprate privileged for the task performed should be directly accepted at least for training towards the category L and B3 licenses: For Category L, B2L and B3 licenses, experience in aircraft maintenance gained outside an aircraft maintenance organisation shall be recognised, when performed under supervision of certifying staff with the aproprate license to release the task performed.	Noted. 66.A.30(c) does not exclude the possibility for the CA to recognise the experience gained in other organisations like aeroclubs.
497	iAOPA Europe; Aufwind GmbH	On AMC 66.A.30(a):Category L certifying staff is not necessarily aimed at working within an aircraft maintenance organisations. Hence we suggest to not demand working experience within an AMO. AMC 66.A.30(a)(4) states, that category L licence applicants are accepted to perform work only during weekends under supervision of indipendend certifying staff. It is not likely, that the applicant will be able to fulfil the requirement of six months / a quater or half of the demanded experience within an AMO. For category L certifying staff, the procedures within an AMO are not necessary to perform the maintenance as independent certifying staff during weekends, as suggested in AMC 66.A.30(a)(4)(i) for categories A: 6 months; (ii) for categories B1, B2, B2L, B3 and C: 12 months.	Noted. 66.A.30(c) does not exclude the possibility for the CA to recognise the experience gained in other organisations like aeroclubs.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
498	iAOPA Europe; Aufwind GmbH	On 66.A.45:Aircraft with electric propulsion have been maintained by certifying staff for a long time now. We suggest to grant the certifying staff with experience in maintenance of electric powered aircraft (e.g. the Lange Antares, Pipistrel Velis, etc.) the endorsement for Group E, given that they have performed at least two annual inspections / 100h inspections on aircraft with electric propulsion. Maintenance experience on electric experimental aircraft (e.g. Solar Impulse) should be accepted.	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
499	iAOPA Europe; Aufwind GmbH	On GM 66.A.45:As stated in the comment to objective a, the distinction of pressurised aircraft certified above FL290 should be dropped to reduce ambiguity.	Noted. Definition of Group 1 has been changed in order to remove simple small piston engine aircraft. However, RMT.0731 will improve the definition of Group 1 adding conditions for electrical/hybrid aircraft and not conventional aircraft.
500	iAOPA Europe; Aufwind GmbH	On Appendix III 6.3.1: We suggest the change to The OJT shall be conducted at and under the control of a maintenance organisation that is appropriately approved for the maintenance of a particular aircraft type or under supervision of independent certifying staff rated for that aircraft in the case of Group 3 aircraft.Reason: These a/c can be maintained by Independent certifying staff.	Noted. In Part-66 the acronym 'OJT' refers to a prerequisite applicable to B1 and B2 licences only required before the first type rating endorsement in the licence.
501	European Aviation Maintenance Training Committee	<p>Page 4 Ref. 2.1.(a) The "legacy aircraft" provision are not clear: "legacy" is 4 time mentioned in the document, only in beginning, not in the regulation sections</p> <p>Page 4 Ref. 2.1.(c) This is welcome, but needs to be clarified: Some member states have state apprenticeships of up to 4 years. Therefore NAAs need guidance on how they can establish a procedure for the acceptance of education in order to guarantee a common level. Otherwise, applicants may be assessed according Part-66 while they already have passed successfully an apprenticeship with assessment following the state program. It is of the utmost importance that already gained skills do not have to be tested again, to avoid unnecessary costs and undermine the value of each program.</p> <p>Page 4 Ref. 2.1.(d) To integrate current and new technology used in aviation into basic training is generally welcome. In this context it is equally important, to remove old outdated technologies, otherwise we keep on only adding with the danger of overloading the basic training content. E.g. old technology only used in a few legacy aircraft shall be included in this type training and removed from the overall syllabus. While on the other hand new technologies shall be taught on a general base in reference to the different aircraft types and the information provided by the producers. E.g. with composite structure the principles with focus on inspection and damage mapping instead on repair. A mixture with specific type-related contents should be avoided.</p> <p>Page 6 Ref. 2.4.(a) For few legacy aircraft, a type examination and demonstration of practical experience will replace the need for an individual TT. No clear amended regulation/AMC/GM in this NPA how these legacy training issues are</p>	<p>Page 4 Ref. 2.1.(a) The 'legacy aircraft' provision: this is just a 'popular' denomination given to those old models for which there is no Part-147 TT training available. This denomination is not used in the rule.</p> <p>Page 4 Ref. 2.1.(c): AMC&amp; GM will provide more guidelines and clarifications on this topic.</p> <p>Page 4 Ref. 2.1.(d): Agree.</p> <p>Page 6 Ref. 2.4.(a): A more precise definition of Group 1 now excludes piston engine aeroplanes from Group 1.</p> <p>Page 6 Ref. 2.4. (b): Due to the diverse and controversial comments received on this NPA, EASA has decided to keep the OJT where it is but improving the OJT standard.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>solved in this P66. the replacement of Type Training with experiences should be embedded in the Part-66 regulation...."pressurised aeroplanes"... Small and old aeroplane models, simple-construction and other than complex motor-powered aircraft (CMPA), e.g. Cessna 400 series, will be moved to Group 3 together with other similar aircraft. This will only solve training issues for non pressurized group 1 aircraft, not the others as required: example: Cessna 421 (pressurized twin piston is in Group 1) while his smaller brother is Cessna 340 series (pressurised twin piston but a Group 3 aircraft).</p> <p>Page 6 Ref. 2.4. (b) Reconsider a uniform statement when OJT has been passed: a 145 MRO needs to be approved by the NAA (chapter 3.15) for their OJT program per aircraft type. The passed OJT engineer receives a OJT logbook which is evaluated by the NAA when applying for a license, for standardisation purposes its preferable that a clear statement of passing of the OJT program is made available to the engineer and NAA, a COR type of document seems huge benefit the NAA's, the engineers and the AMO.</p>	
502	European Aviation Maintenance Training Committee	<p>Page 8 Specific request to stakeholder</p> <p><b>The OJT program</b> is certified by a NAA as part of a 145 approval by accepting MOE chapter 3.15. Currently MRO's and engineers confuse the training practical as part of an type training and OJT, it is recommended to move the whole OJT requirements to 145. In addition in Part-66 it shall stated that an OJT statement/certificate is needed for the first aircraft type in group 1 before a AML shall be issued. So a) either the OJT requirements shall be moved from Part-66 to Part-145 under point 145.A.35 'Personnel requirements' where the AMO shall ensure that maintenance staff have adequate competencies with regard to the aircraft maintained by the organisation; b) or the OJT requirements shall be moved from Part-66 into Part-145 under the organisation qualification scheme</p> <p><b>Page 8 Ref. 2.4.(e)</b> Option 3 seems the most logical, only the propulsion system is radically different, aircraft systems are similar. Therefore 1. Create new 'Group E' in 66.A.5 that will include those electrical aircraft that are not covered by the other groups. 2. Create an 'Electrical Propulsion' module (Module E) that lists a series of subjects related to electrical propulsion technology. It will be necessary to pass Module E before adding the Group E rating in the licence. 3. Existing licence holders could obtain the Group E rating after successful examination of the 'Electrical Propulsion' module.</p>	<p>Noted. Due to the diverse and controversial comments received on this NPA, EASA has decided to keep the OJT where it is, but improving the standard in terms of procedures and selection of the OJT tasks.</p> <p>The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.</p>
503	European Aviation Maintenance Training Committee	<p>Page 11 Ref. 66.A.25 Competency Clear criteria and guidelines for competence assessments in soft skills such as attitudes and behaviour are needed. In addition the term "examination" may be misleading and shall be avoided in this context,</p>	.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>while competency is evaluated with an assessment (and not with an theoretical examination).</p> <p>Page 12 Ref. 66.A.25 (c)The introduction of practical assessment is welcome.But in this section the text mentions "a regular Part-147 basic training course." So far it was always referred to as the "approved basic training course. So please avoid confusion and use the identical terminology.</p> <p>Page 13. Ref. 66.A.25 (e)Clear guidelines for for the competent authority for acceptable credits under (ii) should be defined.Also credit shall be granted for a CAT B applicant if he/she already holds a CAT A AML.</p> <p>Page 14/15/16 Ref. 66.A.30In our understanding in this section (including AMC and GM) is too much focus on Base maintenance experience, because current aircraft type do not need much base maintenance due to new technologies applied. Most AMP/MPD tasks are done in a line maintenance environment and the development of new aircraft types is pointing even more in this direction.In consequence the base maintenance experience requirements shall be reduced.</p> <p>Page 15 Ref. 66.A.30 Item 5.This is generally accepted, but a "higher educational institution recognized by the NAA" allows wide interpretation. We may see a situation where one country accepts a training of several months, while another one does not accept years of studying at a university.We recommend improved guidance from EASA. The requirement for an academic degree should reflect the European degree system (Bachelor/Master).</p> <p>Page 15 Ref. 66.A.30 Item 5 (g)Therefore in consequences a reduction of the course duration shall apply.</p> <p>Page 17 Ref. "Experience in working..."With reference to "Similar work performed on Annex I or state aircraft may be acceptable as well" it is recommende to include also military experience, as there are also comparable technologies used.</p> <p>Page 17 Ref. GM 66.A.30 (a)Combine summarises Table in GM 66.A.30(a) with regulation section please. Now the same info is in two places.</p> <p>Page 18 Ref. AMC 66.A.30 (e) "If the licensing..."In the past the NAAs understanding of an equivalent experience was not comparable? Within the member states apprentice-ships are started with a duration of 6 months it end up between 4 and 5 years. So some NAAs were accepting and crediting for the 6 months education, while other ones had difficulties to recognize the 4 years.It is strongly recommended that the EASA with so many different member states shall provide clear guidelines for rating equivalent experience.</p> <p>Page 18 Ref 66.A.45 EndorsmentThe content of Module E is stated in the AMC, not to be part of APP I which is welcome but inconsistent with the existing Part-66 content. We suggest follwo this exampel here and move all content to the AMC.</p>	<p>Page 11 Ref. 66.A.25 Competency Clear criteria and guidelines for competence assessments in soft skills such as attitudes and behaviour are needed. In addition the term "examination" may be misleading and shall be avoided in this context, while competency is evaluated with an assessment (and not with an theoretical examination).</p> <p>EASA answer: Accepted. The full paragraph A.25 has been reworded to avoid confusion of the term 'competence' with the CBTA element. Now 'examination' is intended for knowledge and 'assessment' is intended for practical skills.</p> <p>Page 12 Ref. 66.A.25 (c) The introduction of practical assessment is welcome. But in this section the text mentions "a regular Part-147 basic training course." So far it was always referred to as the "approved basic training course. So please avoid confusion and use the identical terminology.</p> <p>EASA answer: Accepted.</p> <p>Page 13. Ref. 66.A.25 (e) Clear guidelines for the competent authority for acceptable credits under (ii) should be defined. Also credit shall be granted for a CAT B applicant if he/she already holds a CAT A AML.</p> <p>EASA answer: Not accepted. The CA should simply crosscheck the syllabi content (and knowledge levels) of the national educational system with the Part-66 one. No specific GM is considered necessary.</p> <p>Page 14/15/16 Ref. 66.A.30 In our understanding in this section (including AMC and GM) is too much focus on Base maintenance experience, because current aircraft type do not need much base maintenance due to new technologies applied. Most AMP/MPD tasks are done in a line maintenance environment and the development of new aircraft types is pointing even more in this direction. In consequence the base maintenance experience requirements shall be reduced.</p> <p>EASA answer: Noted. However, this concept has not been discussed within RMT.0255. Maybe it deserves more focused discussions in the future.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>Page 20 Why is practical element listed here? This is for the other modules also not separated listed, therefore inconsistent. Usually knowledge requirements are defined not in this detail: the tasks battery replacement and inspection check seems an overkill as they are already done.</p> <p>Page 22 Ref. 66.B.115 (c) We welcome this change.</p>	<p>Page 15 Ref. 66.A.30 Item 5. This is generally accepted, but a 'higher educational institution recognized by the NAA' allows wide interpretation. We may see a situation where one country accepts a training of several months, while another one does not accept years of studying at a university. We recommend improved guidance from EASA. The requirement for an academic degree should reflect the European degree system (Bachelor/Master).</p> <p>EASA answer: Noted. However, the educational institution should be recognised only comparing the syllabi content and the knowledge levels of the Part-66 Appendices.</p> <p>Page 15 Ref. 66.A.30 Item 5 (g) Therefore in consequences a reduction of the course duration shall apply.</p> <p>EASA answer: Accepted. RMT.0544 will consider this aspect.</p> <p>Page 17 Ref. "Experience in working..." With reference to "Similar work performed on Annex I or state aircraft may be acceptable as well" it is recommended to include also military experience, as there are also comparable technologies used.</p> <p>EASA answer: Accepted.</p> <p>Page 17 Ref. GM 66.A.30 (a) Combine summarises Table in GM 66.A.30(a) with regulation section please. Now the same info is in two places.</p> <p>EASA answer: Accepted.</p> <p>Page 18 Ref. AMC 66.A.30 (e) "If the licensing..." In the past the NAAs understanding of an equivalent experience was not comparable? Within the member states apprenticeships are started with a duration of 6 months it end up between 4 and 5 years. So some NAAs were accepting and crediting for the 6 months education, while other ones had difficulties to recognize the 4 years. It is strongly recommended that the EASA with so many different member states shall provide clear guidelines for rating equivalent experience.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>EASA answer: Noted.</p> <p>Page 18 Ref 66.A.45 Endorsement The content of Module E is stated in the AMC, not to be part of APP I which is welcome but inconsistent with the existing Part-66 content. We suggest to follow this example here and move all content to the AMC.</p> <p>EASA answer: The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of the RMT.0731 'New air mobility'.</p> <p>Page 20 Why is practical element listed here? This is for the other modules also not separated listed, therefore inconsistent. Usually, knowledge requirements are defined not in this detail: the tasks battery replacement and inspection check seems an overkill as they are already done.</p> <p>EASA answer: The proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of the RMT.0731 'New air mobility'.</p> <p>Page 22 Ref. 66.B.115 (c)We welcome this change.</p> <p>EASA answer: Noted.</p>
504	Austro Control	<p>Dear all, Austro Control offers the following comments to NPA 2020-12.</p> <p>The subsequent comments and remarks are based on our insights of the current situation in aviation, and especially of general aviation and experiences gained from daily work with applications and surveillance activities. While there are some general suggestions for a restructured Part-66 are presented in the first comments, the following ones include more specific reflections on related parts in the NPA:</p> <p>(1) New Annex "Part 66L" As a first general proposal we suggest the restructuring of the Part-66. Regarding the structure in Annex III (Part-66) of Regulation (EU) No. 1321/2014 it should be desired to separate all aspects concerning the category L and shift them to a newly created Annex in Regulation</p>	<p>Noted. The scope of RMT.0255 is not to redefine the scope of B1 and B2, although a lot of effort has been made to align the applicability of the BK modules and learning levels.</p> <p>EASA acknowledges the need for simplification of the EU maintenance licensing scheme — also highlighted by the comments received to the survey launched by EASA in 2016 and documented in the report "<a href="#">Evaluation Report Part-66/-147</a>". The answers to that survey showed a recognition of the strong added value of Part-66, whose number of categories, although numerous, provide a robust system. However, it is identified that simplification of Part-66 should be sought as much as possible, not only in terms of the number of (sub)categories but processes too. It is important to highlight that changes to the existing</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>(EU) No. 1321/2014, similarly to the situation of Annex I (Part-M) and Annex Vb (Part-ML). Maintenance related to license holders of category L is mainly located in non-commercial aviation and organisations such as flying clubs. This environment is significantly different to the commercial aviation branch. Consequently, this would allow a more adequate approach for category L and the related general aviation, taking all characteristics of this aviation branch into account by generating a more proportionate rule, including the consideration of more realistic requirements for competencies and usage of privileges. We recommend to separate an Annex “Part 66L” from Annex “Part-66” to create a proportionate and easy understandable system like the situation of Part-ML and Part-M. This shall include practicable recency requirements for the non-commercial maintenance environment.</p> <p>(2) Simplification of license categorisation Some Categories are not really used by the licensees but causing a significant complexity in the licensing system of Part-66. Therefore, categories as given now in 66.A.3 should be reconsidered. While category A should just include 2 sub-categories (aeroplanes and helicopters), category C should be cancelled at all (arguments see below, point 6). Furthermore, it may be desired to cancel category B3 and B2L – as both currently seem not to match the interests of the related branches – and consequently, do not find an utilization but increase the complexity in the licensing system. Alternatively, it may be desired to implement an avionic category as kind of category L-family. We recommend to review and simplify the existing categories.</p> <p>(3) New group E is not adequate In 66.A.5 the new group E does not fit within the logic of the other groups – first, as it uses now alphanumeric labelling instead of numeric; second, it builds a new group of aircrafts being currently mainly represented in group 3 just with another type of engine. Furthermore, in near future the considered aircrafts are mainly to be expected in ELA 1 – and consequently currently are already covered by category L2/L2C. The coverage could also easily take place for category B1.2 or B1.4 (without any further need for an additional module examination, as most of the knowledge content is already given in modules for category B1.2 or B1.4). We recommend to rethink 66.A.5 and prepare a classification of groups along the dimensions airframe, engine and instrument systems, while keeping meanwhile with the current situation, having ELA1 aeroplanes with electric engines covered by categories L2/L2C (and maybe also by B1.2/B1.4).</p> <p>(4) Crediting of category L for other categories With category L a simplified but proportional licence has been established. Beside the adequacy of this</p>	<p>(sub)categories might have a high impact and have to be assessed carefully, which means that more data is needed for a proper risk assessment. As shown in the Best Intervention Strategy on Maintenance 2020, EASA has a pending action for a study to identify the licenses categories that may need to be deleted, merged or created.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>solution for the non-commercial “flying club” aviation segment, this licence may also support the entrance of young people into the market for aviation mechanics. Therefore, an easy step-up from category L to other categories with consideration of the acquired basic knowledge and the cumulated experience should be implemented as far as possible. While in this respect the newly implemented tables in Appendix IV are very helpful, the situation of starting “from scratch” in case of extending the license from category L to category A or B seems to ignore some similar content of basic knowledge modules (e.g. from L2 to B1.2), and does not fully consider cumulated maintenance experience ((e.g. working already more than 5 years in category L) or any background resulting from education (e.g. having passed an acceptable vocational training). We recommend to create a credit system to allow an easier extension from category L to other categories.</p> <p>(5) Simplification of practical assessment While the change for a competency perspective in 66.A.25 is seen as very supportive for safety-oriented maintenance, the implementation of the practical assessment should be reconsidered for several reasons: Firstly, maintenance personnel working in maintenance organisations is already assessed in accordance with the given requirements of Part-145 and Part-CAO and is continuously working and trained in a controlled environment and consequently may not need to pass another practical assessment. The foreseen practical assessment may serve better in case of independent certifying staff. Secondly, practical assessments as described in more detail in the new module 18 are not feasible. The foreseen duration as well as the handling on an operational aircraft may not be doable for Part-147 organisations or the NAAs. In addition, one may also consider situations of long-lasting maintenance experience (e.g. ICAO licenced, military licenced) or applicants which having passed a specific school (e.g. for technical trade in aviation maintenance) as compensating experiences for the foreseen practical assessment. We recommend to simplify the assessment within Part 147 considering the performance of work on items separated from “operational aircrafts”, allow another approach with credits for assessments in case of trainees working in Part 145 or Part CAO organisations or having any other background which could be credited and create a more simplified assessment for category L.</p> <p>(6) Cancellation of Category C Instead of the refinements presented for category C in 66.A.30 it is suggested to cancel category C in Part-66 and shift the topic of qualification for releases for base maintenance to Part-145 (e.g. 145.A.30 and 145.A.35) as the category C is just directly connected with base maintenance and the organisations’ certification authorisations – and does not require any</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>further knowledge, but just experience in maintenance. We recommend to cancel category C</p> <p>(7) Inadequate maintenance experience for category L The requirement for mandatory maintenance experience in a maintenance organisation (Part-145 or Part-CAO) as now expressed in 66.A.30e should not be required for category L, as this requirement would contradict the intended effect of proportionate and adjusted approach for licensing persons maintaining sailplanes, motor-powered sailplanes, ELA 1 aeroplanes or hot-air balloons performing maintenance in non-commercial aviation inside flying clubs. We recommend to delete a mandatory practical experience for category L in maintenance organisations and accept practical experience under supervision of independent certifying staff within the frame of non-commercial maintenance environment (clubs).</p> <p>(8) Module E is not necessary The presented group E module in 66.A.45 does not fit with the regulation’s basic logic and the content could easily be transferred to already existing modules. At least the module should be shifted to Appendix I. We recommend to delete group E (see above) and integrate the relevant content for aircrafts driven by electric propulsion into existing modules.</p> <p>(9) Multi-Media Based Training too liberal formulated The last years have shown that cheating is amongst core determinants for suspicion in surveillance of Part-147 organisations. Therefore, the procedure for the approval of MBT courses in 66.B.135 should be reworded clearly expressing that examinations cannot be performed outside a location under control of the training organisation and with presence of an invigilator in such location. In addition, it should be stated for Part-147 organisations that courses must have a “presence part”, meaning to have at least a minimum of time with direct interaction between instructors and trainees at specified locations in order to ensure the achievement of learning objectives. We recommend to implement statements that examinations must take place in “controlled physical locations” and that courses have to be performed as hybrid courses, having at least a specified amount of “presence” at an approved location. Especially for the practical element it is to be required that it cannot be carried out just virtual/online.</p> <p>(10) Implement surveillance for independent certifying staff and revocation based on application of license holder Regarding 66.B.500 some legal gaps should be closed. Amongst are · the implementation of Part-ML (which is currently not mentioned in the regulation – see 66.B.500 point 8) and · a surveillance procedure for independent certifying staff. While staff inside a maintenance organisation may be surveyed via the surveillance of the maintenance organisation, for independent certifying staff only weak options for</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>surveillance are given. It should be insured that the ACAM process also covers these elements. Furthermore, the revocation of an aircraft maintenance licence based on an application by the license holder should be implemented. We recommend to include Part ML in 66.B.500 and define surveillance procedures – especially for independent certifying staff. Furthermore, the revocation of a license similar to Part FCL (by application of the holder of the license) should be implemented.</p> <p>(11) Proportionate volume of basic knowledge The reorganised Appendix I now contains additional items, which in consequence means an ever-increasing volume of knowledge to be acquired by maintenance staff – without considering the changes of the work environment and adapted processes. The basic knowledge syllabus should be reconsidered and adopted towards relevant knowledge – maybe by splitting up existing modules or preparing a new structure of basic knowledge (consisting of general modules with same content for all categories and specific modules related to categories), which also includes a more eased addition of categories (without having to pass the same modules as ie from category A to category B) – and subsequently less complex situations for these cases. We recommend to reduce the required volume of basic knowledge relating it towards the scope of work and generating an easier understandable module arrangement.</p> <p>(12) Clarification of recognition of passed OJT The OJT approval and process as newly described in the NPA helps to overcome difficulties of approving OJTs in other Member States. The new description clarifies that the OJT process is approved by the performing Part-145 organisation’s authority, while the acceptance of the OJT for endorsing the license is related to the license holder’s authority. Nevertheless, in the newly implemented point 6.6 a reference and format for a standardized attest is missing, which could easily be recognized by the licensee’s authority. A standardized certificate like the Forms 148/149 (for passed basic/type training courses) would support the easy recognition. We recommend to implement a standardized certificate or attestation for the OJT to ease the acceptance for authorities.</p> <p>(13) Flexibility in Appendix II to the AMCs needs guidance For the newly implemented task list in Appendix II to the AMCs more guidance is needed. We recommend to add GM for Appendix II</p> <p>(14) Examinations need controlled physical location It is not seen as sufficient for examinations to relate them to “controlled environment”, as newly defined in 147.A.135. Instead it should be clearly stated that examinations can only take place at specified physical locations with reasonable invigilation (see</p>	



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		above, point 9) as otherwise cheating may not be observable and the security of questions as required by 147.A.135 may not be guaranteed. We recommend to reformulate the paragraph and define for examinations a “controlled physical environment”.	
505	Adria Tehnika	<p>In current Appendix I to Part 66 there is a list of knowledge requirements provided for each module. Modules are then subdivided to sub-modules and are numbered as such for instance Module 12.1) 12.2)...</p> <p>In some cases, they are further subdivided to sub-submodules, (for example 13.13) and then there are different levels defined for each sub-submodule: system layout... Level 1, indications and warnings... Level 3 Please add numbering to these sub-submodules, as they need to be separated in Question Bank - questions must be grouped i.a.w. these submodules and need a common identifier. In this case, each "sub-submodule" should be identified with a number, as submodules are. example: 13.13 Fuel Systems 13.13.1. System layout 13.13.2. Fuel Tanks 13.13.3. Supply systems This would be a benefit for cases where question bank is handled with automated exam generator software in order to simply identify groups of questions in the database/question bank. In current Appendix II to Part 66 a Basic Examination standard is defined. That includes required number of Questions per Module. For some modules, the time allocated is extremely long, for example: Module 13 B2 225 minutes (3h 45 min) Module 11A B1 175 minutes (2h 55min) Module 12 B1 160 minutes (2h 40min) In practice, such long exams create undue stress and situations, where a candidate is forced to abandon his exam due to physiological needs, and this requirement is, in my opinion, disregarding the human performance and limitations, as they are taught in Module 9. Part-147 organization should be allowed to cut long exams (longer than 120min.) in two sessions - "half-exams".</p>	<p>EASA answer: Not accepted. The most preferable solution is not to split the subcategories in different level requirements, 13.3(a) and (b) are ok and in line with other modules, not like 13.2, 13.11.2, 13.13, 13.14, 13.15, 13.16, 13.17, 13.18.</p>
506	European Aviation Maintenance Training Committee	<p><b>Page 25</b> Ref. APP I Cat C is to be removed from text and tables in Appendix I – Basic knowledge and practical assessment requirements (except for Category L license). In the Note below table “...not attend a full Part-147 basic training course” it should read “an approved course” instead for common terminology.</p> <p><b>Pages 27</b> to 38 Modules We recommend that these tables will be moved from hard to soft law and keep a clear reference in the appendix. This will allow to adopt technology changes easier in the future. We do not consider it relevant where the tables are placed, as long as they are outlined once, e.g. in the AMC to assure a level playing field (a deviation would than only be possible via alternative AMC, which needs to be approved by the NAA). Therefore a danger that education levels might differ from country to country is seen not expected.</p> <p><b>Pages 29 + 30</b> Due to small number of AC and only applicable for B3 – 6.3.2 and</p>	<p>Page 25 Ref. APP I Cat C is to be removed from text and tables</p> <p>EASA answer: Not accepted. It improves the understanding of the modules required for Cat. C.</p> <p>in Appendix I - Basic knowledge and practical assessment requirements (except for Category L license). In the Note below table “...not attend a full Part-147 basic training course” it should read “an approved course” instead for common terminology.</p> <p>EASA answer: Accepted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>6.3.3 should be only level 1.</p> <p><b>Page 30</b> Soldering is one of core work in EWIS (7.7) and welding is more B1 work with sheet metals. Therefore we propose to – integrate existing 7.15 a) into 7.7, and – integrate 7.15 b) into 7.14.1.</p> <p><b>Page 31 + 32</b> Ref. Module 9 We have very similar requirements in Module 9, in Part-145 and Part-Camo. Suggest to harmonize the content under the same title “Safety and Human Factors Training”. This way if somebody completes Module 9 (Safety and HF) during his Part-66 training he complies automatically with the requirements of Part-145.30.e in GM1 145.A.30e for Human Factors (initial) training as well as Part-CAMO.A.305(g) in AMC3 CAMO.a.305(g) “Safety Training (Including Human Factors)”. Right now, if somebody gets his AML as per PART-66, works in a 145 MO and changes to a CAMO he has to do (and pay) for an almost identical training 3 times. Maybe the best solution would be a statement in Appendix I like “Successful completion of Module 9 fulfils the requirements of Part-145.30.e and Part-CAMO.A.305(g) for Safety and Human Factors training”. This way it would help the newcomers in our industry. Therefore we strongly recommend to adjust the module 9. HUMAN FACTOR to reflect the content called for in Part-CAMO.A.305(g) for Safety and Human Factors training.</p> <p><b>Page 39</b> Ref. Module 18 Good starting point to assure minimum level of competence. Proposal: Mechanic with confirmed experience (Practical Training Record/Logbook) shall get credits on Module 18. Module 18 describes in 3. Basic training methods “Appropriate training methods .. for the entire course... and available training methods”. This module was especially introduced for self-starters without formal training to ensure their practical skills. For applicants attending training either in an approved course or during relevant vocational training these aspects are already covered in Part-147 or national curricula. This paragraph leaves room for interpretation that a self-starter has to have or proof attendance of such training which is not intended. Therefore 3. Basic training methods: This paragraph should be removed entirely. Training is not relevant for the Module 18. Practical assessment.</p> <p><b>Page 54</b> Ref. Module 8.2B3 and B2L aerodynamics knowledge should be the same level. Page 57 Ref. 10.7 Add “PART-CAO” to 10.7: “General understanding of Part-M, Part-ML Part-CAMO”.</p> <p><b>Page 60</b> Ref. 11.5.2 MLS should be removed. Obsolete and non used system.</p> <p><b>Page 63</b> Ref. 11.19 Add overall system description and theory, typical system layouts as it is very important to describe how the functional units are connected together in core system with data buses. Page 68 Ref. 12.11. Remove “Fuel dumping”. Fuel dumping is not a helicopter feature.</p>	<p>Pages 27 to 38 Modules We recommend that these tables will be moved from hard to soft law and keep a clear reference in the appendix. This will allow to adopt technology changes easier in the future. We do not consider it relevant where the tables are placed, as long as they are outlined once, e.g. in the AMC to assure a level playing field (a deviation would than only be possible via alternative AMC, which needs to be approved by the NAA). Therefore a danger that education levels might differ from country to country is seen not expected.</p> <p>EASA answer: Noted. Details of the module’s content are in the AMC.</p> <p>Pages 29 + 30 Due to small number of AC and only applicable for B3 - 6.3.2 and 6.3.3 should be only level 1.</p> <p>EASA answer: Accepted.</p> <p>Page 30 Soldering is one of core work in EWIS (7.7) and welding is more B1 work with sheet metals. Therefore, we propose to - integrate existing 7.15 a) into 7.7, and - integrate 7.15 b) into 7.14.1.</p> <p>EASA answer: Accepted.</p> <p>Page 31 + 32 Ref. Module 9 We have very similar requirements in Module 9, in Part-145 and Part-Camo. Suggest to harmonize the content under the same title “Safety and Human Factors Training”. This way if somebody completes Module 9 (Safety and HF) during his Part-66 training he complies automatically with the requirements of Part-145.30.e in GM1 145.A.30e for Human Factors (initial) training as well as Part-CAMO.A.305(g) in AMC3 CAMO.a.305(g) “Safety Training (Including Human Factors)”. Right now, if somebody gets his AML as per PART-66, works in a 145 MO and changes to a CAMO he has to do (and pay) for an almost identical training 3 times. Maybe the best solution would be a statement in Appendix I like “Successful completion of Module 9 fulfils the requirements of Part-145.30.e and Part-CAMO.A.305(g) for Safety and Human Factors training”. This way it would help the newcomers in our industry. Therefore we strongly recommend to adjust the module 9. HUMAN FACTOR to reflect the content called for in Part-CAMO.A.305(g) for Safety and Human Factors training.</p> <p>EASA answer: Partially accepted. M9 now contains elements of safety management.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p><b>Page 68+69</b> Ref. 12.17 Add overall system description and theory, typical system layouts. Current tasks goes too direct to detail issues without any basic theory and system background. Page 69-76 Ref. Module 13 General comment to the Module 13 submodules. Why so many submodules are divided to a), b), c), etc.? This make level structure quite complex and will effect questions too (see our comments AMC Appendix II / MOD 13). We recommend to use similar submodule structures than used in Module 11 and 12.</p> <p><b>Page 70</b> Ref. 13.2 Structures — General Concepts / Could these all sub items (a to d) be same level.</p> <p><b>Page 75</b> Ref. 13.20 Integrated Modular Avionics (ATA 42) Typo — Beed shall be Bleed management; In 13.20 current tasks are going directly to detail issues without any basic theory and system background. Add overall system description and theory, typical system layouts.</p> <p><b>Page 78</b> Ref. Module 15.7 Remove from text convergent, divergent and variable area nozzles as they are only applicable on military jets.</p> <p><b>Pages 83-86</b> Module 18 Current MOD 18 proposal consist mainly A and B1 working tasks. MOD 18 should also include B2 working tasks for B2 and B2L self studied candidates. Especially some main Avionic tasks should be described, like electric measuring, troubleshooting, instruments/meters, navigation, communication and etc. We recommend to add the following for B2 &amp; B2L licence: 1. EWIS – Cable and connector work 2. Radio communication testing 3. Radio Navigation testing – ILS / VOR / RNAV 4. Pitot static testing 5. Soft Ware upload / down load / testing – example : Cabin equipment testing – NAV database loading 6. Autopilot testing 7. Troubleshooting for system failures – including schematics and wiring manual reading – Using MCDU and system diagnostics</p> <p><b>Page 87</b> Ref. 3. Basic training methods We 217 candidate to apply those requirements also to classroom training, as we see the need to improve this training as well.</p> <p><b>Page 87</b> Ref Appendix II 1. General Subject 1.4 Remove all essay questions: "Introduction of 7.21 Documentation &amp; Communication, as well as Module 18 E. Documentation and communication: — Use of the applicable documentation; — Writing of work reports, aircraft technical logs and troubleshooting reports; — Demonstration of good oral and written communication during shift handover; — Demonstration of clear and comprehensive communication with colleagues" was suggested as a way to eliminate essay questions altogether by ensuring the candidate can communicate in a clear and concise manner in relation to actual work performed and not academic topics. Proposal: If EQ is required further on then it should be part of</p>	<p>Page 39 Ref. Module 18 Good starting point to assure minimum level of competence.</p> <p>Proposal: Mechanic with confirmed experience (Practical Training Record/Logbook) shall get credits on Module 18. Module 18 describes in 3. Basic training methods "Appropriate training methods .. for the entire course... and available training methods". This module was especially introduced for self-starters without formal training to ensure their practical skills. For applicants attending training either in an approved course or during relevant vocational training these aspects are already covered in Part-147 or national curricula. This paragraph leaves room for interpretation that a self-starter has to have or proof attendance of such training which is not intended. Therefore 3. Basic training methods: This paragraph should be removed entirely. Training is not relevant for the Module 18. Practical assessment.</p> <p>EASA answer: Noted. 3. Basic Training Methods is a legacy of RMT.0281.</p> <p>Page 54 Ref. Module 8.2 B3 and B2L aerodynamics knowledge should be the same level.</p> <p>EASA answer: Not accepted.</p> <p>Page 57 Ref. 10.7 Add "PART-CAO" to 10.7: "General understanding of Part-M, Part-ML Part-CAMO".</p> <p>EASA answer: Accepted.</p> <p>Page 60 Ref. 11.5.2 MLS should be removed. Obsolete and non used system.</p> <p>EASA answer: Accepted.</p> <p>Page 63 Ref. 11.19 Add overall system description and theory, typical system layouts as it is very important to describe how the functional units are connected together in core system with data busses.</p> <p>EASA answer: Accepted. AMC &amp; GM will provide the necessary guidance.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>module 18 only. Not in the subject related modules Note: State of the art technical communication and documentation are part of M7 and M9 anyway. Subject 1.2. For clarity text should change to “Basic knowledge examinations with a maximum allowed time of more than 90 minutes or more than 180 minutes may be split in two and three partial exams respectively. Regarding item (c) Over all this is not correct and gives the applicant more burden. - an exam is passed with 75% when carried out with only 1 (not partial) exam. - Then there is no reason why each part of a partial exam needs to be passed with 75% in the split version. Especially not when it is unclear if only the partial exam can be re-taken. Page 88-90 Module exam Remove all essay questions – see previous comment Page 91 Ref. Module 18 We welcome the practical assessment. Page 126-131 Ref. Module 13 Number of questions for B2 and B2L to be adjusted. Should be at least the same number of MC questions as B2. If a student has done all B2L system exams he should be able to do a Delta M13 to become B2: but counting the questions for this exam we need 29 MC questions and this is not dividable to 4 so we need more questions. Question amounts should be combined to bigger groups. Not one by one for every sub-sub items. ref. 13.2, 13.11.2, 13.13, 13.14, 13.15, 13.16, 13.18, See a good example of distribution in 13.10 Onboard Maintenance Systems (ATA 45) and 13.20 Integrated Modular Avionics (IMA) (ATA 42) and MOD 11 &amp; 12 question structure. Page 139 Module 18 Duration of the days stated should include 5 hrs of introduction (i.e. safety briefing and workshop regulations as well as 4 hours of de-brief on the assessment results. Why task amount is fixed in A. assessment but not in B. assessment? B2: Is that justified demand to select 2 task from Table a) if those are not applicable competencies for B2 licence? (Ref. II. Competencies related to the licence category the candidate applies for Table (a) applicable to the licence categories A1, A2, A3 and A4:) All B2 tasks should be selected from table b) according to B2 task requirements Licence holder who apply for another licence category shall receive a credit: - 2 days credit for CAT A holder to B1- full credit from B1 to B2- full credit from B2 to B1 Page 140 Ref. Appendix III — Aircraft type training and examination standard — On-the-job training (OJT)(iv) Delete last part of sentence: “... as it is for the basic knowledge modules (ref. point 1.12 of Appendix II)” to avoid confusion Page 141 Ref. 3. Aircraft type training standard When allowing Aircraft Type Trainings as of MBT training method, the EASA shall also include possibilities of distance exams. Refer to definitions in RMT.0281. Page 144 Ref. 1. Unclear why the one year waiting period is not deleted as is now done for BT examinations. (line up between both is required), max. 3 attempts per 12 months. Therefore remove the 1-year waiting period between</p>	<p>Page 68 Ref. 12.11. Remove "Fuel dumping". Fuel dumping is not a helicopter feature. EASA answer: Accepted. AMC &amp; GM will provide the necessary guidance.</p> <p>Page 68+69 Ref. 12.17 Add overall system description and theory, typical system layouts. Current tasks goes too direct to detail issues without any basic theory and system background. EASA answer: Accepted. AMC &amp; GM will provide the necessary guidance.</p> <p>Page 69-76 Ref. Module 13 General comment to the Module 13 submodules. Why so many submodules are divided to a), b), c), etc.? This make level structure quite complex and will effect questions too (see our comments AMC Appendix II / MOD 13). We recommend to use similar submodule structures than used in Module 11 and 12. EASA answer: Accepted. M11, M12 and M13 structure has been reshaped accordingly.</p> <p>Page 70 Ref. 13.2 Structures — General Concepts / Could these all sub items (a to d) be same level. Not accepted. M13.2 now has only two subchapters (a) General concept at level 2; and (b) Fundamentals of structural systems at level 1 (less relevant for B2s).</p> <p>Page 75 Ref. 13.20 Integrated Modular Avionics (ATA 42) Typo — Beed shall be Bleed management; In 13.20 current tasks are going directly to detail issues without any basic theory and system background. Add overall system description and theory, typical system layouts. EASA answer: Accepted.</p> <p>Page 78 Ref. Module 15.7 Remove from text convergent, divergent and variable area nozzles as they are only applicable on military jets. EASA answer: Accepted.</p> <p>Pages 83-86 Module 18 Current MOD 18 proposal consist mainly A and B1 working tasks. MOD 18 should also include B2 working tasks for B2 and B2L self</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>sets everywhere. Page 148 Ref. 6.5 (c) In “— Content of the assessment (theoretical and practical)”; Remove “Theoretical and...” NO Theoretical assessment was part of the type examination... OJT is not Theoretical, its about gathering practical experience on the required type (1e in the category) Page 149 Ref 6.6 The compliance report does not need to be approved by the competent authority. Why: MOE is already approved by CA, so when report is created after OJT is successfully completed by the 145, it should be approved. Page 149 Ref. 6.7 As the OJT is provided within Part-145 organisations (not Part-147 organisations), we recommend to directly state the requirement here and not to refer to Part-147. In 219andidat we strongly recommend to align the record requirements with the exiting 219andidate 219ts for relevant training completed stated in 145.A.35 (j). Maintenance data are kept under Part-145.A.55 anyway, so there OJT tasks performed can be traced if needed. Page 150 AMC to Appendix III... As students are required to proof proficiency in the language of the OEM maintenance date no translator should not be provided during any part of the course, examination or evaluation. Page 151 Ref. (c)(iv) Differences training We appreciate the possibility of the differences training. In 219andidat we would welcome, if the combined B1+B2 aircraft type training would not expire when one categorie has been completed and endorsed. Page 152 Ref 4.(b) The use of an MSTD (i.e. flat panel trainer): this definition is not consistent with AMC to Section 1 of Appendix III to Part-66 ‘Aircraft Type Training and Examination Standard. — On-the-job training’. We suggest the following wording: The use of an appropriate synthetic device (e.g. MSTD, Simulator, Mock Up etc.) Page 154 Ref. 4.1 There must be as a minimum requirement the physical presence of an invigilator or a virtual surveillance. Page 156 Ref. 6.4.3 Remove Organisational Procedures from OJT tasks. This is the duty of the Part-145 for CRS training where the 219andidate is finally exercising his priviledges Page 156 Ref. Paragraph “Where no such data exists, ...” We request to delete: “ideally 50 % of the tasks in line maintenance and 50 % of the tasks in base maintenance”. Specific tasks are not related to line or base maintenance. Page 156 Ref. Paragraph “Other tasks than ...” Please rewrite text for clarification purposes. The aim of the text is not clear. Page 157 Ref. “The use of MSTDs ...” In our understanding the use of MSTDs and MTDs for OJT should be allowed, as long as the MSTD and MTD 100 % act/react as the real airplane. Especial for the fully integrated flight decks of modern computerized aircrafts, where maintenance procedures can be easily, tested/trained it is a must to achieve competence. Page 157 Ref. 6.5 Paragraph “Tasks which are usually...” We request to allow 6 candiates at the time and not limit to 3. Experience from previous OJTs shows that a mentor may take care of up to 6 trainees without</p>	<p>studied candidates. Especially some main Avionic tasks should be described, like electric measuring, troubleshooting, instruments/meters, navigation, communication and etc. We recommend to add the following for B2 &amp; B2L licence:</p> <ol style="list-style-type: none"> <li>1. 1.EWIS - Cable and connector work</li> <li>2. 2. Radio communication testing</li> <li>3. 3. Radio Navigation testing - ILS / VOR / RNAV</li> <li>4. 4. Pitot static testing</li> <li>5. 5. Soft Ware upload / down load / testing - example : Cabin equipment testing - NAV database loading</li> <li>6. 6. Autopilot testing</li> <li>7. 7. Troubleshooting for system failures - including schematics and wiring manual reading - Using MCDU and system diagnostics</li> </ol> <p>EASA answer: Accepted.</p> <p>Page 87 Ref. 3. Basic training methods We recommend to apply those requirements also to classroom training, as we see the need to improve this training as well. EASA answer: Noted. This is outcome of RMT.0281.</p> <p>Page 87 Ref Appendix II 1. General Subject 1.4 Remove all essay questions: "Introduction of 7.21 Documentation &amp; Communication, as well as Module 18 E. Documentation and communication: — Use of the applicable documentation; — Writing of work reports, aircraft technical logs and troubleshooting reports; — Demonstration of good oral and written communication during shift handover; — Demonstration of clear and comprehensive communication with colleagues" was suggested as a way to eliminate essay questions altogether by ensuring the candidate can communicate in a clear and concise manner in relation to actual work performed and not academic topics. Proposal: If EQ is required further on then it should be part of module 18 only. EASA answer: Noted.</p> <p>Subject 1.2. For clarity text should change to "Basic knowledge examinations with a maximum allowed time of more than 90 minutes or more than 180 minutes may be split in two and three partial exams respectively. Agreed.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>compromising OJT quality. For complex tasks the training of team work is actually desired. Page 158 Ref. 6.6 Second Paragraph We recommend to remove the phrase "It is good practice to assess the practical skills on the aircraft in question while the assessment of knowledge may be performed either on the aircraft or in theory." Remember OJT is not a Training only experience orientated: the candidate has already passed the Type training (TH + PR) text is confusing. Page 160 Ref. Table B include an expanded table from one license category to another license category, based on submodules and, remove duplications on the differences (delta) training. This is easy to require the whole modules as submodules are passed already in other categories: example M5:5.1 is done in B1.1 same level 5.4, 5.5 (a), 5.6 (a), 5.11, 5.12, 5.13, 5.14, 5.15, 5.16 is done in B1.1 same level Examination only for : 5.2 and 5.3, 5.6(b), 5.7, 5.8, 5.9, 5.10 this applies as well for multiple submodule in 13 which are done in M11: example : 13.5 id identical to 11.6. M15 COVER M14 completely in depth. M14 is not required for a B1.1 to B2!</p>	<p>Regarding item (c) Over all this is not correct and gives the applicant more burden. - an exam is passed with 75% when carried out with only 1 (not partial) exam. - Then there is no reason why each part of a partial exam needs to be passed with 75% in the split version. Especially not when it is unclear if only the partial exam can be re-taken. EASA answer: Not accepted. The applicant shall pass the exam with good marks in all the elements of the exam.</p> <p>Page 88-90 Module exam Remove all essay questions - see previous comment EASA answer: Accepted.</p> <p>Page 91 Ref. Module 18 We welcome the practical assessment. EASA answer: Noted.</p> <p>Page 126-131 Ref. Module 13 Number of questions for B2 and B2L to be adjusted. Should be at least the same number of MC questions as B2. If a student has done all B2L system exams he should be able to do a Delta M13 to become B2: but counting the questions for this exam we need 29 MC questions and this is not dividable to 4 so we need more questions. Question amounts should be combined to bigger groups. Not one by one for every sub-sub items. EASA answer: Noted. AMC &amp; GM will provide the necessary guidance.</p> <p>ref. 13.2, 13.11.2, 13.13, 13.14, 13.15, 13.16, 13.18, See a good example of distribution in 13.10 Onboard Maintenance Systems (ATA 45) and 13.20 Integrated Modular Avionics (IMA) (ATA 42) and MOD 11 &amp; 12 question structure. EASA answer: Accepted. M13 structure has been reshaped accordingly.</p> <p>Page 139 Module 18 Duration of the days stated should include 5 hrs of introduction (i.e. safety briefing and workshop regulations as well as 4 hours of de-brief on the assessment results. Why task amount is fixed in A. assessment but not in B. assessment?</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>B2: Is that justified demand to select 2 tasks from Table a) if those are not applicable competencies for B2 licence? (Ref. II. Competencies related to the licence category the candidate applies for Table (a) applicable to the licence categories A1, A2, A3 and A4:)                      All B2 tasks should be selected from table b) according to B2 task requirements                      Licence holder who apply for another licence category shall receive a credit:- 2 days credit for CAT A holder to B1- full credit from B1 to B2- full credit from B2 to B1                      EASA answer:                      Accepted. AMC &amp; GM will provide the necessary guidance.</p> <p>Page 140 Ref. Appendix III — Aircraft type training and examination standard — On-the-job training (OJT)(iv) Delete last part of sentence: "... as it is for the basic knowledge modules (ref. point 1.12 of Appendix II)" to avoid confusion                      EASA answer:                      Accepted.</p> <p>Page 141 Ref. 3. Aircraft type training standard When allowing Aircraft Type Trainings as of MBT training method, the EASA shall also include possibilities of distance exams. Refer to definitions in RMT.0281.                      EASA answer:                      Noted. This is outcome of RMT.0281.</p> <p>Page 144 Ref. 1. Unclear why the one year waiting period is not deleted as is now done for BT examinations. (line up between both is required), max. 3 attempts per 12 months. Therefore remove the 1-year waiting period between sets everywhere.                      EASA answer:                      Accepted.</p> <p>Page 148 Ref. 6.5 (c) In "— Content of the assessment (theoretical and practical)"; Remove "Theoretical and..." "NO Theoretical assessment was part of the type examination... OJT is not Theoretical, its about gathering practical experience on the required type (1e in the category)                      EASA answer:                      Accepted.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>Page 149 Ref 6.6 The compliance report does not need to be approved by the competent authority. Why: MOE is already approved by CA, so when report is created after OJT is successfully completed by the 145, it should be approved. EASA answer: Accepted.</p> <p>Page 149 Ref. 6.7 As the OJT is provided within Part-145 organisations (not Part-147 organisations), we recommend to directly state the requirement here and not to refer to Part-147. In addition we strongly recommend to align the record requirements with the exiting requirements for relevant training completed stated in 145.A.35 (j). Maintenance data are kept under Part-145.A.55 anyway, so there OJT tasks performed can be traced if needed. Page 150 AMC to Appendix III...As students are required to proof proficiency in the language of the OEM maintenance date no translator should not be provided during any part of the course, examination or evaluation. EASA answer: Partially accepted. Records of the OJT Report and associated data shall be kept by the maintenance organisation where the OJT is conducted, in accordance with the procedures agreed with the competent authority of the maintenance organisation.</p> <p>Page 151 Ref. (c)(iv) Differences training We appreciate the possibility of the differences training. In addition we would welcome, if the combined B1+B2 aircraft type training would not expire when one categorie has been completed and endorsed. EASA answer: Noted.</p> <p>Page 152 Ref 4.(b) The use of an MSTD (i.e. flat panel trainer); this definition is not consistent with AMC to Section 1 of Appendix III to Part-66 'Aircraft Type Training and Examination Standard. — On-the-job training'. We suggest the following wording: The use of an appropriate synthetic device (e.g. MSTD, Simulator, Mock Up etc.) EASA answer: Noted. This is outcome of RMT.0281.</p> <p>Page 154 Ref. 4.1 There must be as a minimum requirement the physical presence of an invigilator or a virtual surveillance.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>EASA answer: Accepted.</p> <p>Page 156 Ref. 6.4.3 Remove Organisational Procedures from OJT tasks. This is the duty of the Part-145 for CRS training where the candidate is finally exercising his privileges EASA answer: Accepted. AMC &amp; GM will provide the necessary guidance.</p> <p>Page 156 Ref. Paragraph "Where no such data exists, ..."We request to delete: "ideally 50 % of the tasks in line maintenance and 50 % of the tasks in base maintenance". Specific tasks are not related to line or base maintenance. EASA answer: Accepted.</p> <p>Page 156 Ref. Paragraph "Other tasks than ..."Please rewrite text for clarification purposes. The aim of the text is not clear. EASA answer: Accepted.</p> <p>Page 157 Ref. "The use of MSTDs ..."In our understanding the use of MSTDs and MTDs for OJT should be allowed, as long as the MSTD and MTD 100 % act/react as the real airplane. Especial for the fully integrated flight decks of modern computerized aircrafts, where maintenance procedures can be easily, tested/trained it is a must to achieve competence. EASA answer: Not accepted. OJT is real work.</p> <p>Page 157 Ref. 6.5 Paragraph "Tasks which are usually..."We request to allow 6 candidates at the time and not limit to 3. Experience from previous OJTs shows that a mentor may take care of up to 6 trainees without compromising OJT quality. For complex tasks the training of team work is actually desired. EASA answer: Accepted. AMC &amp; GM will provide the necessary guidance.</p> <p>Page 158 Ref. 6.6 Second Paragraph We recommend to remove the phrase "It is good practice to assess the practical skills on the aircraft in question while the assessment of knowledge may be performed either on the aircraft or in theory.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			<p>"Remember OJT is not a Training only experience orientated: the candidate has already passed the Type training (TH + PR) text is confusing. EASA answer: Accepted.</p> <p>Page 160 Ref. Table B Include an expanded table from one license category to another license category , based on submodules and, remove duplications on the differences (delta) training. This is easy to require the whole modules as submodules are passed already in other categories: example M5: 5.1 is done in B1.1 same level 5.4, 5.5 (a), 5.6 (a), 5.11, 5.12, 5.13, 5.14, 5.15, 5.16 is done in B1.1 same level Examination only for : 5.2 and 5.3, 5.6(b), 5.7, 5.8, 5.9, 5.10 this applies as well for multiple submodule in 13 which are done in M11: example : 13.5 id identical to 11.6. M15 COVER M14 completely in depth. M14 is not required for a B1.1 to B2!</p> <p>EASA answer: Noted. Indeed, Appendix I and Appendix VII syllabi require different levels of knowledge for different licence categories within a module; therefore, there are additional examinations applicable to certain modules for licence holders wishing to extend a Part-66 AML to include another category/subcategory and an analysis of the module shall be conducted to determine the subjects missing or passed at a lower level.</p>
507	European Aviation Maintenance Training Committee	<p>Page 230 Ref. "Credit may be..."We request to replace "assessor" by "mentor" here. Pages 230-239 Ref. Tabel We recommend that EASA simplifies the table or provide better guidance for its use.This table is hardly workable and will create a standard with little comparison of OJTs possible.</p>	Accepted.
508	European Aviation Maintenance Training Committee	<p>Page 245 Ref. 147.A.100 (j)Delete "This derogation applies only to distance learning and not to the corresponding examination and/or assessment."Reason: Considering NPA changes on page 249 of 258 criteria are defined that have to be met by "controlled environment". It should be possible to open up for solution finding/new concepts that meet all requirements regarding examination that are not explicitly "classroom" examinations. This is the next logical step following the changes regarding virtual training.Page 246 Ref. GM 147.A.100(i)Please clarify the meaning "...student access being under controlled supervision."Page 247 Ref. 147.A.115 (a)"For virtual training..."Good starting point, MSTDs are highly beneficial for learning results of student. But needs to be developed further: Open</p>	<p>Page 245 Ref. 147.A.100 (j) Delete "This derogation applies only to distance learning and not to the corresponding examination and/or assessment."Reason: Considering NPA changes on page 249 of 258 criteria are defined that have to be met by "controlled environment". It should be possible to open up for solution finding/new concepts that meet all requirements regarding examination that are not explicitly "classroom" examinations. This is the next logical step following the changes regarding virtual training.</p> <p>Noted. This is outcome of RMT.0281.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>up for shift in state of the art and future training concepts using MSTDs (e.g. benefits for practical training and reduced access to aircraft or new modern aircraft types).Page 247 Ref. 147.A.115 (d)"The aircraft type..."Please clarify: adequate use of MSTD acceptable to replace access to aircraft type?Page 248 Ref. AMC 147.A.115(a)The "(CBT)" acronyms should be removed.The purpose of such action is to avoid any conflict with existing official use of CBT standing for Competency Based Training.Suggestion is to use MBT (Multi Media Based Training).The 3rd chapter requires clarification "- the computer system requirements of any third-party provider are covered by a written agreement concluded between the two parties and includes the terms of delivery, data security and data integrity". If the "two parties" are the Part-147 organization and the student's organization, it needs to be written.Page 248 Ref. AMC 147.A.130(a)In the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014 Issue 2 — Amendment 2, the distance learning training methods are assessed to be of a limited suitability for level 3 elements of theoretical courses. This limitation seems appropriate for Distance learning asynchronous (E-Learning) However, based on the experience of many courses performed during the Covid containment period, we estimate that, if the classic training methods (i.e. face-to-face classroom instruction) are adapted to virtual classroom instruction (Instructor lead in real time with appropriate equipment's and tools) the distance learning synchronous method ensures the theoretical element part (including Level 3) is delivered at the same standard as face to face in the classroom. This is due to the fact that instructor and the trainees can ask questions/have dialogue all in real time.Page 249 Ref. 147.A.135 ExaminationsThere must be as a minimum requirement the physical presence of an invigilator or a virtual surveillance.Enable online examinations. See comment on 245 of 258 the requirements should at least open up to allow new concepts/digital solutions that e.g. in flight crew training have already been established. The requirement "controlled environment" should always be complied with but the means of compliance should allow to find solution that enable future maintenance training (to accommodate for changes through digitalisation)Please clarify: Online examination at trainee site allowed? (please enable online examinations) Knowledge examinations may also be conducted by accessing the examination questions via uniform resource locator (URL) addresses, provided the knowledge examination environment is under the control of the maintenance training organisation and fulfils the criteria of a controlled environment (please see above 245 and 249 of 258)</p>	<p>Page 246 Ref. GM 147.A.100(i) Please clarify the meaning "...student access being under controlled supervision."</p> <p>Noted. This is outcome of RMT.0281.</p> <p>Page 247 Ref. 147.A.115 (a) "For virtual training..."Good starting point, MSTDs are highly beneficial for learning results of student. But needs to be developed further: Open up for shift in state of the art and future training concepts using MSTDs (e.g. benefits for practical training and reduced access to aircraft or new modern aircraft types).Page 247 Ref. 147.A.115 (d)"The aircraft type..."Please clarify: adequate use of MSTD acceptable to replace access to aircraft type? Noted. This is outcome of RMT.0281.</p> <p>Page 248 Ref. AMC 147.A.115(a) The "(CBT)" acronyms should be removed. The purpose of such action is to avoid any conflict with existing official use of CBT standing for Competency Based Training. Suggestion is to use MBT (Multi Media Based Training). The 3rd chapter requires clarification "- the computer system requirements of any third-party provider are covered by a written agreement concluded between the two parties and includes the terms of delivery, data security and data integrity". If the "two parties" are the Part-147 organization and the student's organization, it needs to be written.</p> <p>Accepted.</p> <p>Page 248 Ref. AMC 147.A.130(a) In the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to Annex IV (Part-147) to Commission Regulation (EU) No 1321/2014 Issue 2 — Amendment 2, the distance learning training methods are assessed to be of a limited suitability for level 3 elements of theoretical courses. This limitation seems appropriate for Distance learning asynchronous (E-Learning) However, based on the experience of many courses performed during the Covid containment period, we estimate that, if the classic training methods (i.e. face-to-face classroom instruction) are adapted to virtual classroom instruction (Instructor lead in real time with appropriate equipment's and tools) the distance learning synchronous method ensures the theoretical element part (including Level 3) is delivered at the same standard as face to face in the classroom. This is due to the fact that instructor and the trainees can ask questions/have dialogue all in real time.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			Page 249 Ref. 147.A.135 Accepted.
509	European Aviation Maintenance Training Committee	First thank you for this comprehensive work. Well done. But altogether it leaves the training and maintenance community with some open questions while overlooking the changes. It is noted, that the theoretical knowledge content has significantly increased, only minor items are removed, which means our engineers need to increase their theoretical knowledge as well. One of the key questions is, whether this review has been done in relation to the current required aircraft maintenance skills? Current skills are different from 20 years ago, new aircraft and technology is significantly changed, but what is the effect on course duration, for example a reduction of the 2400 hrs or focusing on different learning objectives? Why should an aircraft engineers cover all aircraft skills required to service A/C from 1920-2021? It seems it needs an engineering superman to manage all this knowledge and examinations, but we need to reduce the ballast to keep this job attractive and safely manageable. The pandemic showed us, that we can work in virtual environment, with only very short lead-time, something nobody expected before. Gathering information in the moment of need – called knowledge work - is one of the future key competences, not remembering more and more details which may be outdated rather sooner than later when innovation strikes. Following today's development of technology and digitalisation we need to focus on key knowledge and skills to build up a resilient competence, which can cope with the current and coming development in aviation. We must not add more and more details, which will be forgotten anyway when not in use, which is a humans characteristic and known in the pedagogical world!	Accepted. However, the determination of the required knowledge is not an easy task.
510	SFF, Svensk Flygteknikerförbundet (Assoc. of Swedish Licensed Aircraft Engineers).	Page 8 SFF oppose the initiative to open up for new inputs on OJT after all the work that has been done in the rulemaking group. The idea to open up for the option to move OJT to part 145 is not acceptable.	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
511	SFF, Svensk Flygteknikerförbundet (Assoc. of Swedish	66.A.25 Basic competency requirements. SFF supports the introduction of practical skill test and making the Basic requirements more focused on competency, while still keeping the knowledge requirements robust. This will	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
	Licensed Aircraft Engineers).	improve the situation with lack of skills on new candidates, ref. objective (c) in Ch. 2.1. Page 22.66.B.115 and AMC 66.B115. Several industry stakeholders would question the mutual recognition if it was introduced. There is no need for the change to make it mandatory for the NAA to accept an OJT scheme from any EASA Part-145 organisation in any country. The possibility to accept OJT from other countries is already there in today's AMC.	
512	SFF, Svensk Flygteknikerförening (Assoc. of Swedish Licensed Aircraft Engineers).	Page 250 147.A.200 Approved basic training course The idea of a future shortage of Aircraft Maintenance Personnel and the need for shorter duration in training is driving this initiative to open up for shorter duration than the MINIMUM duration stated in Part-147. This argument should not be the main driver for a change of the regulation. We oppose a change allowing less hours than stated in Appendix 1 minimum duration. Courses with more hours than minimum duration can still benefit from changes in training technologies and methods. Standardisation would suffer from this change in the regulation. Competent Authorities will not be able to assess the effects of the procedures introduced by 147-organisations and the way they will adjust the duration of training justified by "new" training methods. Basic Training is in some member states is part of the state controlled educational system and performed during a fixed duration. In addition to our general concerns for standardisation, this will undermine the national educational systems and create a market for the lowest bidders. The abilities needed in the role as a Licensed Aircraft Engineer come with a certain level of education, including time spent. We strongly believe that a certain duration in basic training is one factor to prepare students for their future role.	Noted. From CRD to NPA of RMT.0281: Regarding your comment about the reduction of the minimum duration of the training, please note that we did not propose any reduction of the training duration in basic training courses (Part-147 Appendix I). Instead, in the replaced point 147.A.200(g) we have introduced the following provision: '(g) Notwithstanding point (f), in order to benefit from changes in training technology and methods (theoretical training), the number of hours as established in Appendix I (Basic training course duration) may be amended provided that the syllabus content and schedule describe and justify the proposed change. A procedure shall be included in the MTOE to justify these changes.' This means that a part of the training course conducted as distance learning (self-paced methods, student-centred methods) may result in reduction or extension of the time spent for learning depending on the pace or need of each individual student. Hence, only the instructor-centred training (traditional classroom training, teaching in a virtual classroom, distance learning synchronous) can be expressed in hours; student-centred methods cannot, they are rather expressed as 'completion of the content', irrespective of how long the student has spent mastering the content.
513	iAOPA Europe; Aufwind GmbH	On 66.A.20(b)(1):The Holder of an aircraft maintenance licence should be able to exercise its privileges in compliance with any Annex of the regulation, not only in compliance with Annex I and Annex II. Hence, we suggest to change the paragraph into: The holder of an aircraft maintenance licence may not exercise its privileges unless:1. in compliance with the applicable requirements of Annex I (Part-M), Annex II (Part-145), Annex Va (Part-T), Annex Vb (Part-ML), Annex Vc (Part-CAMO) or Annex Vd (Part-CAO); and	Not accepted. The AML holder is not required to know all the CAW Regulation.
514	iAOPA Europe; Aufwind GmbH	On 66.A.20 (b)(2):We are convinced, that the recency requirement necessary to execute the privileges of a category L licence is too extensive, given the limited scope of a category L licence. This license is meant to be obtained through (voluntary) weekend work, so it should be possible to keep it current using voluntary weekend work. The demand of performing six months maintenance work within one year equals a quarter full time job during the weekends. This is not commensurate to the privileges of the license. We suggest to remove any	Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c). However, EASA is evaluating the possibility to revise as quickly as possible the



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>requirement based on "time spent" and rather introduce the performance of certain tasks for the currency requirements. We believe the release of three 100h/annual checks should be sufficient for the scope of the category L license, where two checks might be replaced by other maintenance tasks (i.e. complex maintenance tasks, repairs, embrodiment of changes). Furthermore, given the aero-club nature of many category L licence holders, we believe that not only work performed or supervised, but also training given and training recieved should be counted in full towards the recency requirement of the category L licence.</p>	<p>rule 66.A.20(b) 2, making it proportionate for L licences, but this action needs to be framed into another rulemaking activity.</p>
515	private	<p>A relief of the requirement for continuing mainenance experience for L licences (66.A.20 (b) (2)/AMC 66.A.20 (b) (2)) or the introduction of an alternative qualitative requirment is necessary.Explanation:The application of 66.A.20 (b) (2) to the holder of an L licence requires maintenance experience of at least 6 month within the preceding two years to exercise the privileges of the L licence. It is understood that one of the mean reasons for the creation of the L licence was the idea to support maintenance activities on very simple aircraft (such as gliders, powered gliders, ELA1- aircraft ) in a non-commercial, voluntary environment such as flying clubs and private owners as an essential part of GA-community. Under the current rules (66.A.20 (b) (2) / AMC 66.A.20 (b) (2) / GM66.A.20 (b) (2) ), it is nearly impossible to meet that requirement for maintenance staff on voluntary/free-time basis as it is typically the case in the non-commercial club environment. The typical technical staff has their profession outside of aircraft maintenance but often within a technical background on fulltime-basis. Even if the 50% reduction according to AMC 66.A.20(b)(2) is applied, it will be required do 50 days of maintenance in two years resp. 25 days per year on full-time basis. This would still consume the complete annual vacation of a typical employee. As maintenance in clubs is carried out mostly during the winter season, there are only about 15-20 weekends available for the maintenance of a typical club-owned fleet. Furthermore it is likely, that there are not enough maintenance tasks to do in order to fulfill the requirements of 66.A.20(b)(2) in an average fleet of flying club when it is well maintained. It is well know, that the quality of maintenance carried out in flying club-environment can be at a high standard, comparable to maintenance done in commercial workshops, even though it is done voluntary in the free time if the correct procedures are applied. Thus this quantitative requirement of experience is not adequate and should be replaced by a qualitative approach. Such approach is already in place for the accumulation of experience for the initial issuing of the L licence according to AMC 66.A.30(a) 4. Possible solution: Exclude certain L licences (at least L1/L1C/L2/L2C) from the</p>	<p>Noted. EASA comprehends that the recency requirements of Part-66 in 66.A.20 (b) are of great concern to the GA community. Certifying staff acting mainly as volunteers in aeroclubs are not able to demonstrate 6 months of practical experience within the last 24 months in order to maintain their privileges; nevertheless, the rule is a direct transposition of ICAO Annex I, point 4.2.2.2 c).</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>requirement of 66.A.20(b)(2). The licence holder is still obligated to ensure that "he/she has the adequate competence to certify maintenance on the corresponding aircraft" in accordance to 66.A.20(b)(3). Or alternatively: Modify AMC 66.A.20(b)(2) as follows (bold content added): 1. Duration: [...] "When a licence holder maintains and releases aircraft in accordance with M.A.801(b)1, in certain circumstances this number of days may even be reduced by 50% ( in case of a L1/L1C/L2/L2C licence a further reduction or the replacement with alternative qualitative or quantitative criteria is also possible) when agreed in advance by the competent authority." Thus the competent authority can ensure an equivalent level of safety under consideration of local prerequisites and the type of operation of the aircraft and may agree further conditions for the individual case. Furthermore the licence holder is still obligated to maintain that "he/she has the adequate competence to certify maintenance on the corresponding aircraft" in accordance to 66.A.20(b)(3). /* Style Definitions */ table.MsoNormalTable GM 66.A.20(b)2 "Privileges" and EASA FORM 26 (VIII. CONDITIONS) should be adapted accordingly (exclude/adapt 6-month criteria for L licence)</p>	
516	Airbus Helicopters	<p>Comments on NPA 2020-12 Comment on Appendix III — Aircraft type training and examination standard — On-the-job training (OJT) paragraphs 3.1 (page 141) and 3.2 (page 142) Airbus Helicopters supports the introduction of the OSD constituent MCSD that, according to the latest CS-MCSD includes in the mandatory Box 1 content the Minimum list of practical tasks As indicated in CS MCSD.400, the OSD mandatory elements are define as the aircraft maintenance configuration, the minimum list of practical tasks and the maintenance areas of special emphasis (MASE). In particular in GM1 MCSD.410, EASA encourages recent evolutions are preferred also for an optimal integration with Part-66 Appendix III. Even more precisely in GM1 MCSD.420, it is indicated that the selection of the practical tasks shall be complemented with clear instructions for their appropriate integration with the requirements of Appendix III of Part-66. Eventually, the MASE are intended to cover, together with the other elements of OSD MCSD, the elements introduced due to type variations, technological changes, etc. It is therefore understood that the OSD, when available, does not require further burden for compliance with Part-66 Appendix III provisions to be imposed to the stakeholders. Indeed this would undermine the benefit of the introduction of the OSD and suggest no confidence can be gained in its content. It is therefore proposed to update the NPA text as follows (AH additions in grey highlights): 3.1 Theoretical element (e) Content: As a minimum, the elements in the Syllabus below that are specific to the aircraft type shall be covered, unless</p>	Noted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>operational suitability data (OSD), established in accordance with Regulation (EU) No 748/2012 is available. If available, the minimum syllabus of the operational suitability data (OSD), established in accordance with Regulation (EU) No 748/2012, shall define the content of the theoretical elements to be implemented. Additional elements introduced due to type variations, technological changes, etc. shall also be included, unless operational suitability data (OSD), established in accordance with Regulation (EU) No 748/2012 is available. [...] 3.2. Practical elements [...] (b) Content: If available, the minimum list of practical tasks of the OSD, established in accordance with Regulation (EU) No 748/2012, shall be part define the content of the practical elements. Unless operational suitability data (OSD), established in accordance with Regulation (EU) No 748/2012 is available for the particular aircraft type the content of the practical elements shall include at least 50 % of the crossed items in the table below, which are relevant to the particular aircraft type, shall be completed as part of the practical training. Tasks crossed represent subjects that are important for practical-training purposes to ensure that the operation, function, installation and safety significance of key maintenance tasks is adequately addressed, ; particularly where these cannot be fully explained by theoretical training alone. Although the list details the minimum practical training subjects, other items may be added where applicable to the particular aircraft type. Tasks to be completed shall be representative of the aircraft and systems in terms of both in complexity and in the technical input required to complete that task. While relatively simple tasks may be included, other more complex tasks shall also be incorporated and undertaken as appropriate to the aircraft type.</p>	
517	European Sailplane Manufacturers Association	<p>The European Sailplane Manufacturers have long experience and a clear understanding about the "ecosystem" in which these sailplanes are operated in Europe and world-wide: These thousands of aircraft are in the vast majority operated by gliding clubs and private owners, which in turn are mostly organised in those clubs. These clubs are organised in the national gliding federations and associations. The majority of maintenance work is done in these clubs by voluntary staff (or the owners themselves but still in this club environment). The organisation of the training of the technical personnel is typically organized on the federation and association level and - coupled with the high motivation of the technical staff participating in this technical hobby - has led to a high safety standard with regard to maintenance of sailplanes. Additionally, a considerable number of (mostly relative small) commercial maintenance organisations is working in this field - specializing on more complicated tasks and or helping the private owners which do not work on their gliders themselves and/or are not</p>	<p>Noted. Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016:</p> <ul style="list-style-type: none"> <li>— facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as 'legacy aircraft';</li> <li>— enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts;</li> <li>— reduce the deficit of the practical skills of maintenance staff; and</li> <li>— update the basic knowledge syllabus.</li> </ul> <p>A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules.</p>



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		organised in the gliding clubs. Last but not least the manufacturers do participate also in continuing airworthiness by doing some maintenance tasks themselves and by offering training and technical expertise especially in regard to new developments and technologies (like new propulsion systems or when new structural materials had been introduced). This continuing airworthiness "ecosystem" of the gliding system evolved over many years and in different national flavours. In all cases it has led to a good safety standard. When Part-M and Part-66 were introduced years ago to standardize all this in Europe it brought many changes with a lot of additional effort without a safety benefit but with a lot of additional paperwork and associated costs in time and money. This was brought to the attention of EASA which then reacted with the GA roadmap to reduce this additional effort, which was and still is laudable and appreciated. Still we (the manufacturers and probably the majority of the gliding communities) have the opinion that the regulations do not help. In the best case they do not hinder our self-organized continuing airworthiness ecosystem. If the EU would decide tomorrow that all this needs no state oversight and regulation this would not be a problem, the gliding would continue and probably no effect on the safety level would be seen. EASA sponsored studies of completely non-regulated airport-communities and our own experience when looking into sailplanes operated as Experimentals in the USA show this very clearly. Therefore we still see no benefit to increase more complex rules and to increase the demand on the gliding communities with regard to the maintenance rules. Therefore please find in our comments our very sceptical and rather disappointed view towards the proposals within NPA2020-12.	It was not the objective of this RMT to change the structure and scope of the recently created L licences.  Practical Skills Assessment Module: NPA 2020-12 introduces a new requirement — practical assessment — for obtaining an L licence. The GA community perceives this requirement as too difficult to comply with, especially when involving Part-147 organisations and competent authorities. But following other discussions had within the review group (RG) of the RMT.0255, the Opinion is adjusted to include the possibility for other organisation (aeroclubs, etc.), as accepted by the competent authority for the licence, to carry out this assessment in the same way it is done for the examination of the basic knowledge modules.
518	IAA	Objectives to be addressed Difficulties with OJT- Moving OJT to 145 under their qualification system request for feedback – makes individuals more dependent on the maintenance organisation for licence qualification	Noted. EASA has not received a clear direction from the various comments on how to improve the OJT. Very different positions, opinions and interests impede reaching a general consensus that is one of the most important conditions that justify any amendment of the rule. In virtue of that, EASA has decided to leave the OJT as it is now but improving the procedure and making more robust the identification of an OJT programme. No mandatory mutual recognition will be imposed in the rule.
519	IAA	66.A.25 Basic competency requirements – adds practical assessment for initial or additional category/sub category or system rating Insufficient detail on assessments for additional (sub) category/category If full 3 days assessment is needed for adding an A2 to an A1 might be considered too much Similarly adding a B2 would require a 5 day assessment for potentially a fully qualified B1 who might have been type rated for a period of time Adding time and cost to industry Max number of attempts is 3 within 12 months (i.e. no longer	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		requiring 3 month gap) This is an improvement as it gives some flexibility to when repeat exams can be accomplished Template for Exam question spread per sub section has been added Will need 147's to align exam templates, lot of work for no/little gain, suggest it only be applied for new approvals (i.e. allow a grandfather mechanism if no major deviation from new standard)	
520	IAA	66.A.30 Experience requirements (g) Can give credit for basic training course (excluding mod 1 & 2) for reduction in experience when mod 1 & 2 are credited by a competent authority Although the maths in Appendix I is not advanced, it is never the less being taught as a mental skill, and a pen and paper skill. The ability to do mental math and to have an awareness or a sense of the correctness of a calculation is very important. Industry experience indicates problems with students passing module 1 & 2 for this reason even though students have passed higher/equivalent exams. Also allowing a number of students to join a class after a number of weeks is disruptive to the class dynamic and adds complexity. Even in the case of where the whole class would be able to waive modules 1 & 2 the reduction in the overall amount of training is minor and would reduce the benefit of a refresher/foundation prior to starting new modules as many students can be mature students	Noted.
521	IAA	66.A.45 Aircraft ratings Module E basic exam required for additional of Group E (electrical propulsion) aircraft rating in Cat B1/B3 & C The Syllabus also includes a list of practical tasks, it is unclear where this list of tasks is indicated as needed ?	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
522	IAA	66.B.115 Authority SHALL accept OJT approved in MOE 3.15 by another authority OJT The OJT task numbers is undefined, there is a suggestion that there should be more than 1 task in each ATA/(sub)ATA from the text and this would be supported b,y for example ATA 05 has one X item (INS) with a note indicating 6 tasks from 3 groups of a total of 36 suitable tasks. Clarity is needed around the number of tasks per ATA, for example ATA 12 has one X item (SGH) with a 50% against the category, when we look at current OJT appendix II there is 12 tasks listed. This would suggest that 12 task should be listed and 6 should be accomplished? Or does it mean one tasks is listed in ATA 12, and only 50% of the SGH column of tasks need be completed, meaning there is a 50% chance an ATA 12 task is accomplished Unfortunately without clear minimum number of tasks, some organisations will look for and get approval with the least amount of tasks possible. Under current OJT regulations this authority would estimate that most submitted OJT log books have between 160 and 200 tasks completed, but we have received log books with as low as 60 tasks meeting the requirements being approved under their authority. We have also seen log	Accepted. This will be specified within AMC/GM.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		books with a significant number of LOC tasks included. i.e. a vast difference in application of the rule. These have not been accepted. I would suggest that each ATA should have a minimum number of tasks assigned before authorities shall accept OJT Regulation should have more minimum detail rather than maximising flexibility	
523	IAA	<p>Appendix III (iv) the 3 year type training limit does not apply to those elements of the theoretical and practical training and the OJT that were passed to the same level as part of the endorsement of the type in another licence (sub) category as it is for the basic knowledge modules</p> <p>App II 1.12 AMC restates this as an example First off App II 1.12 is not the whole same as stated here, as it does not apply “to those elements” of the exam, it applies to the whole exam cert Secondly this situation already applies and the new text suggests that there is an allowance for certs over 3 years old which will lead to increased queries and wasted authority time explaining the situation. As per the GM example it would be more beneficial to allow acceptance of full credit of the certificate if it was used to obtain a rating, or at least a re-crediting mechanism for the type training in the additional category so that retraining may not be needed e.g. where a licence holder has completed a B1/B2 type training and has added the B1 rating to his licence and has been certifying the type and after four years they add a B2 basic category and then wish to add the B2 type rating, they shouldn't have to go through the full differences training when currency/exam/assessment might be enough</p> <p>Note: While B1 to B2 type training courses are widely available and not too long, when going from a B2 to B1 route, there is very few courses available so a full course would be more normally required Similarly, for military personnel unable to get a EASA Part 66 due to needing civil experience who might have completed type training and be certifying non-civil aircraft in EU airspace for a number of years, on discharge and getting their Licence they find that their type training is over 3 years and have to redo all their type training. The lack of a suitable crediting mechanism disproportionately penalises EU national military personnel when transitioning to civil aviation, it adds cost to industry personnel, an authority examination could confirm knowledge and competence will be re-assessed by the Part 145 prior to authorisation.</p>	Accepted. Text has been reworded to read: '(iv) the differences training shall have been started and completed within 3 years preceding the application of the new type rating, case (a), or the application of the new licence category, for the case (b)'
524	LEONARDO Helicopters	<p>Appendix III — Certificates of Recognition (CoR) referred to in Annex IV (Part-14) — EASA Forms 148 and 149 Basic Training/Examination Pag 251 of the NPAThe contents of the EASA Form 148a (Issue 4) template should be adapted to include the results of the partial exams i.a.w. App. II §1.12 Proposed text:Each</p>	Not accepted.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		partial exam shall:[...] be listed on the same certificate of recognition that will be issued after the last partial exam has been successfully passed; the certificate of recognition shall list the dates and the results of the partial exams – without averaging the results;	
525	LEONARDO Helicopters	Appendix III — Certificates of Recognition (CoR) referred to in Annex IV (Part-14) — EASA Forms 148 and 149 Basic Training/Examination Pag 251 of the NPACoronavirus is making the use of electronic documents crucial for ensuring business continuity. Their use provides several benefits to organizations: time saved, simplified approval processes and saving on paper and shipping costs. Therefore, in our opinion this emergency situation should be used as an opportunity to speed-up the transition from paper-based to electronic documents, including Certificate of Recognitions (CoR). We suggest to start a project for the digitalization of the CoR with the objective of providing an easy-to-use service and enabling MTOs to issue CoR in a fully digitised format. The CoR issued by MTOs could also be uploaded in a platform accessible to the CA of the MS so that they can authenticate the certificate in real time before update the licences.	Noted. Appendix III to Part-147 does not exclude the possibility for digital CoR. EASA has already started a digitalisation project. Please refer to this link for more information: <a href="https://www.easa.europa.eu/en/newsroom-and-events/events/digitalisation-aviation-industry-be-part-change">https://www.easa.europa.eu/en/newsroom-and-events/events/digitalisation-aviation-industry-be-part-change</a> .
526	LEONARDO Helicopters	General comment on Part-66Coronavirus is making the use of electronic documents crucial for ensuring business continuity. Their use provides several benefits to organizations: time saved, simplified approval processes and saving on paper and shipping costs. Therefore, in our opinion this emergency situation should be used as an opportunity to speed-up the transition from paper-based to electronic documents, including maintenance licences. In analogy with dLAP project, we suggest to start a project for the digitalization of the maintenance licences with the objective of providing an easy-to-use service and enabling maintenance staff to carry their licences in a fully digitised format on their own personal mobile devices. The use of a platform to manage digital maintenance licences will also enable the CA of the MS to update or authenticate the licences in real time.	Noted. RMT.0731 EPL will address this issue.
527	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	general comment: this NPA does not go in the general sense of a simplification of a regulation that is becoming too complicated. Considering the technological developments in aviation, Category B1 / B2 should be merged in one category B (eventually differentiated for Aeroplanes and Helicopters), and Category C, in particular that which can be obtained through an academic path, should be eliminated (see also comment 2 below).	Noted. Deletion or combination of the licence categories was not within the scope of this NPA, although some steps have been done towards the direction of reducing the distance between some AML categories (e.g. between B1.1 and B2).
528	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	66.A.20(a)7: rather than introducing this provision to include the privileges of Cat. C with respect to other than CMPA into those of Cat. C with respect to CMPA, we would suggest to eliminate category C at all. The role of Part 66 category C License	Noted. Deletion or combination of the licence categories was not within the scope of this NPA, although some steps have been done towards the direction of reducing the distance between some AML categories (e.g. between B1.1 and B2).



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		for the issuance of CRS for Base maintenance may be assigned by approved AMO to holder of appropriate Cat BX with 5 yrs of experience exercising category BX privileges on CMPA(including other than CMPA) or on other than CMPA or as support staff according to point 145.A.35, or, a combination of both.	
529	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	66.A.25(c): we would suggest to remove "from the loop" the competent licensing authorities: to train NAA inspectors capable of carry-out such a practical assessment would be extremely complex. In addition, what is to be intended for adequate skills is not adequately defined. In any case this skill test may be moved at the end of period requested for gaining required practical experience under responsibility of a Part 147 organisation or an appropriate recognized Part 145 AMO.	Noted. However, EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.
530	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	66.A.25(g): the provision of this paragraph should be removed if the suggestion of removing Cat C license is accepted. Otherwise, it should be clarified the purpose of this paragraph	Noted. Deletion or combination of the licence categories was not within the scope of this NPA, although some steps have been done towards the direction of reducing the distance between some AML categories (e.g. between B1.1 and B2). EASA acknowledges the need of simplification of the EU maintenance licensing scheme also highlighted by the comments received to the survey launched by EASA in 2016 and documented in the report ' <a href="#">Evaluation Report Part-66/-147</a> '. The answers to that survey showed a recognition of the strong added value of Part-66, whose number of categories, although numerous, provide a robust system. However, it is identified that simplification of Part-66 should be sought as much as possible, not only in terms of the number of (sub)categories but processes too. It is important to highlight that changes to the existing (sub)categories might have a high impact and have to be assessed carefully, which means that more data is needed for a proper risk assessment. As shown in the Best Intervention Strategy on Maintenance 2020, EASA has a pending action for a study to identify the licenses categories that may need to be deleted, merged or created.
531	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	66.A.30.3 & 4 should be removed if the suggestion of removing Cat C license is accepted. Details on how to qualify the Cat B CS/SS to act in former Cat C role should be moved in Part 145.	Noted. Deletion or combination of the licence categories was not within the scope of this NPA, although some steps have been done towards the direction of reducing the distance between some AML categories (e.g. between B1.1 and B2). EASA acknowledges the need of simplification of the EU maintenance licensing scheme also highlighted by the comments received to the survey launched by EASA in 2016 and documented in the report ' <a href="#">Evaluation Report Part-66/-147</a> '. The answers to that survey showed a recognition of the strong added value of Part-66, whose number of categories, although numerous, provide a robust system. However, it is identified that simplification of Part-66 should be sought as much as possible, not only in terms of the number of (sub)categories but processes too. It is important to highlight that changes to the existing (sub)categories might have a high impact and have to be assessed carefully, which means that more data is



COMMENT NUMBER	ORGANISATION	Comment	EASA response
			needed for a proper risk assessment. As shown in the Best Intervention Strategy on Maintenance 2020, EASA has a pending action for a study to identify the licenses categories that may need to be deleted, merged or created.
532	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	66.A.30.3 point (g): the concept addressed in this paragraph should be extended also to modules M3, M4, M8, M9	Not accepted. A major part of the RG was contrary to this proposal seeing too many differences in the EU national systems.
533	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	In Module E: engine instruments and alarms should be added	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
534	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	GM 66.A.45: airplanes that have hybrid propulsion, or that use SAF with a blend greater than 50%, or that use the open rotor or propfan, or all those that for any reason can perform navigation procedures SBAS or GBAS, or PBN Vertical, or that are equipped with synthetic vision or combined vision should be added to Group 1	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
535	Ente Nazionale per l'Aviazione Civile (ENAC - Italian CAA)	Contents of the modules: topics to add module 6: electrochromic glass module 7: inspection of fuel tanks following the use of SAF fuels module 8: laminar supersonic flow control, and mach cut-off speed module 10: environmental certification and control of CO2 emissions, and NVPM module 11: fuel plant for SAF sustainable fuels module 12: noise abatement navigation procedures module 13: instrumentation for monitoring and control of gaseous, non-gaseous, Co2, NVPM and nitrogen oxides emissions module 14 and 15: open rotor and propfan	Noted. Module 6: electrochromic glass: <i>Unclear why there would be a need to add this requirement, as engineers will only work on certified aviation parts;</i> Module 7: inspection of fuel tanks following the use of SAF fuels; <i>no different from the current procedures in the AMM: needs to be used as instructed.</i> Module 8: laminar supersonic flow control, and mach cut-off speed: <i>These subjects are present as they were moved from M11 to M8.</i> Module 10: environmental certification and control of CO2 emissions, and NVPM: <i>is Part of 10.6, but as this is Level 1 it is not very relevant for an AML holder, more relevant for P21 staff.</i> Module 11: fuel plant for SAF sustainable fuels: <i>The option to add type of fuels in use in M11.10 is considered.</i> Module 12: noise abatement navigation procedures module: <i>not relevant as these are requirements for helicopter maintenance engineers, not for pilots.</i> Module 13: instrumentation for monitoring and control of gaseous, non-gaseous, Co2, NVPM and nitrogen oxides emissions: <i>Nitrogen has been added to type training knowledge.</i> Modules 14 and 15: open rotor and propfan: <i>Requirements already included in these modules.</i>
536	KLM Engineering & Maintenance	General Changes to the Basic Training could impact the TMC (Type Mechanic Course) choice module for students doing a technical education in aircraft maintenance (i.e. ROC Hoofddorp/Amsterdam) and with that this could influence the standard for hiring new staff, for example ROC students (= long term issue)	Accepted. An adequate transition period is established and specified in the Articles of the Cover Regulation, in order to allow for the implementation of the changes by the competent authorities and the training organisation.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		How do we address the differences in standard of training between present workforce versus students who leave school following the latest curriculum? - Grandfather rights voor present workforce.	Some grandfathering provisions are provided for training and exams passed according to the old requirement.
537	KLM Engineering & Maintenance	AMC 147.A.130(a) training procedures and quality system Addition to table 3 (Page 794 of 1107   Feb 2021) Include 6 (MSTD) in Distance Learning Synchronous Add a note stating the requirement that the use of a MSTD in a DLS training should include a means of logging the student activity.(see attachment)	Noted.
538	KLM Engineering & Maintenance	Appendix III (OJT) Page 147 The requirements for a mentor are set too high and the differences versus an assessor are too little. They have experience in training other people (such as being apprenticeship trainers, Part-147 trainers, have delivered train-the-trainer courses, or have any other comparable national qualification) - Change requirements for example: They are able to coach colleagues within the scope of their job description. Assessor They have experience and/or have received training in examining others (such as being apprenticeship trainers, Part-147 examiners, have delivered train-the-trainer courses, or have any other comparable national qualification). - Change examining to assessing ( taking an examination is the privilege of an examiner)	Not accepted. The requirements for mentor and assessor are adequate to the scope.
539	KLM Engineering & Maintenance	Page 148 -156 NPA suggests to have all OJT tasks assessed. - Comment: This is a too greater burden. Do an assessment on a limited number of selected tasks. Once the basic understanding is confirmed then there is no need to assess all tasks.	Noted. The assessors shall not assess all the tasks.
540	KLM Engineering & Maintenance	147.A.145 Page 249 Theoretical training, knowledge examinations, practical training and practical assessments may be carried out only at the locations identified in the approval certificate and/or at any location specified in the maintenance training organisation exposition (MTOE). This is neither practical nor feasible for Line Stations. Either all stations (with PT/PA) would have to be approved and mentioned in the MTOE (huge administrative burden for a large company) or staff would have to travel to an approved station which would be a financial burden.- Comment & remove practical training and practical assessments from this amendment limiting it to theoretical training and knowledge examinations.	Noted.
541	IACO - International Aviation Consulting	With the publication of ICAO Annex 19 and the development of SMS in civil aviation, Module 9 should now be called SMS. The management of our companies and in particular the maintenance organisations is done with the SMS. HF and especially human errors are part of SMS. The Annex 19 must be used in order to develop this Module 9. This whole module should be oriented on safety culture and present the SMS with the 4 pillars in detail and not only have a §9.9 on safety management. Develop in particular pillar 2 on risk management.	Noted. SMS are organisational requirements for Part-CAMO and Part-145; the Part-66 AML holder does not work only at these organisations. The scope must be wider than only SMS; the intent of M9 is for the AML holder to have sufficient knowledge of human factors aspects' contribution to reach the required safe aviation standard during their work. In this WG it was noticed that between various domains human factors knowledge requirements are not aligned.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		The difference between danger (hazard) and risk. Criticality. Present the SHELL model as a definition of FH. Present the REASON model with examples of latent failures as well as active failures leading to accidents. Make the link with the need to write reporting occurrences. Present concrete examples of continuing airworthiness management and maintenance errors with catastrophic consequences. Differences between error and fault. Right culture. Human error and system error. In this module, also recall the list of points in 66.B.500. In this module, place §10.8 of this NPA (Oversight principles and Safety Management Systems in Continuing Airworthiness). Alleviate some § of the current module 9, keep the dirty dozen.	Therefore, EASA has decided to align all human factors knowledge requirements and update M9 accordingly.
Late Comment	FOCA	General comments: FOCA appreciates the work that EASA put in the proposed NPA 2020-12. We agree in general with the intentions of this NPA. Regarding the Annex III (Part-66), we think that the past efforts to simplify the requirements related to general aviation (Cat. L) have made the Part-66 as it is now. The rules are complex and difficult to understand for all persons concerned. Therefore, FOCA proposes the creation of a new Annex “Part-66L” that is separated from the Annex III (Part-66) in order to achieve a proportionate and easily understandable system as it is defined today in Part-M and Part-ML.	Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.
Late Comment	FOCA	66.A.3 Licence categories and subcategories (not in this NPA) Categories as given in 66.A.3 should be reconsidered. Indeed there is no request for licence categories B3 and B2L. With the introduction of the L- license the category B3 is in our view obsolete and should be deleted. For the category B2L we never received any requests at all and therefore, this category should be deleted from Annex III as well. As there is no demand for these licenses, the EASA Part-147 training organisations do not offer any basic training for B2L and B3. With the removal of these two categories, the legislation would become simpler and easier to understand.	Noted. The main scope of RMT.0255, as defined in ToR RMT.0255, is to resolve four well defined issues as identified by the survey launched by the Agency in 2016: — facilitate the type-rating endorsement for aircraft without a Part-147 type training, referred to as well as ‘legacy aircraft’; — enhance the efficiency of the on-the-job training (OJT) that is affected by the lack of its mutual recognition between licensing authorities which, consequently, creates duplication of administrative efforts; — reduce the deficit of the practical skills of maintenance staff; and — update the basic knowledge syllabus. A subgroup of experts revised the L basic knowledge modules of Appendix VII to correct some evident errors and improve/optimize the content of the modules. It was not the objective of this RMT to change the structure and scope of the recently created L licences.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
Late Comment	FOCA	<p>66.A.5 Aircraft groups</p> <p>We see no benefit in creating an extra group for e-aircraft. Requirements for a license of aircraft powered by electrical propulsion systems can be found in the existing groups. In the near future, we might have hybrid AC with electro propulsion producing the energy with a conventional engine. With the logic of this NPA, another new group would be necessary.</p> <p>Therefore, requirements for electrical propulsion should be integrated into the existing license groups like the B1, B2 and subcategories. Part-66 basic training modules 14, 15, 16 contain already propulsion for the B1 and B2 license applicant. These modules could easily be amended to include electrical propulsion systems or at least the aspects that are not already covered in the basic training module 3. We should have limitations as described in 66.A.45 (f)(ii). Therefore, we propose that no additional rating should be generated</p>	Noted. However, the proposal of Module E as the condition to obtain a type rating endorsement for the aircraft with electrical propulsion has been rejected in favour of another proposal that will be included in the NPA of RMT.0731 'New air mobility'.
Late Comment	FOCA	<p>66.A.20 Privileges</p> <p>FOCA welcomes the proposal that Category C, with respect to complex motor-powered aircraft, includes the privileges of category C with respect to other than complex motor-powered aircraft</p>	Noted.
Late Comment	FOCA	<p>66.A.25 Basic competency requirements</p> <p>FOCA is not in favour regarding module 18. Until today, almost all initial B license applicants gained their experience in a Part-145 or Subpart F/ CAO Organization (that means in a controlled environment with an approved defined syllabus and a subsequent assessment).</p> <p>This is maybe different for the L- license where the required experience is gained on weekends (semi-professional or hobby worker) and is supervised from a colleague with the corresponding license.</p> <p>We do not see why the Part-147 organisation should be responsible to evaluate the competency of the students. This is the responsibility of the maintenance organisation, which will issue a company authorization, after the assessment has been successfully carried out. Because they have the competent persons for such assessments.</p> <p>With the execution of the OJT for the first aircraft, there is enough opportunity to qualify the competence of a person. If this proposal would be implemented in the proposed set up, we expect similar problems as we experienced with the OJT when two different organization are involved for the same subject.</p> <p>Furthermore, we miss the possibility in the NPA to give credit to skilled workers. There are persons who gained several years of experience with an ICAO annex1 AML requesting a part-66 license after passing all theoretical modules or persons who gained several years' experience in the military or working on state aircraft.</p>	Accepted. EASA has decided not to include the practical skills assessment as proposed in the NPA for the reasons explained in the Opinion Section 2.5.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>It should be possible to give credit to their skills and experience.</p> <p>In our opinion, there will be no additional safety benefit with the implementation of the proposed requirement. It looks more like an additional burden to achieve a Part-66 license and solely a business opportunity for Part-147 organizations.</p> <p>We would appreciate the possibility to accept any experience above three years for the above mentioned licence applicants. Further, we would welcome if EASA would provide a practical basic training experience syllabus, which allow giving credit to existing experiences.</p>	
Late Comment	FOCA	<p>66.A.30e Basic experience requirements</p> <p>Whether someone gains his experience in the military or on state aircraft (for example on a fighter) or on military used aircraft with a civil TC (for example EC 332 / 632), no difference is made in the NPA. A differentiation should be made between 6 months and 12 months required experience for such applicants.</p> <p>The same should be applied if a person gained the experience in a production organization. The differentiation should be made if a person worked on all stages in an assembly line of an aircraft with a civil TC or if he only worked on one specific assembly section and could not gain the complete experience of the correlation of a complete AC.</p> <p>Furthermore, the requirement for mandatory maintenance experience in a maintenance organisation (Part-145 or Part-CAO) as expressed in 66.A.30e should not be required for category L, as this requirement would contradict the intended effect of proportionate and adjusted approach for licensing persons maintaining sailplanes, motor-powered sailplanes, ELA 1 aeroplanes or hot-air balloons performing maintenance in non-commercial aviation inside flying clubs. Instead, practical experience gained under supervision of an independent certifying staff should be accepted as well.</p>	Noted. The new point (e) indeed does not exclude the opportunity for a L licence holder to get experience in aeroclubs.
Late Comment	FOCA	<p>66.A.30 g</p> <p>For the purpose of reducing the required amount of experience, a basic training course without Modules 1 and 2 of Appendix I to Annex III (Part-66) is considered a full basic training course when Modules 1 and 2 are demonstrated by examination or are credited by a competent authority.</p> <p>We are of the opinion that this requirement is not necessary for most member states. It seems to satisfy one particular NAA. We suggest that all modules that are credited by the competent authority should be considered as a full basic training course.</p>	Noted. Modules 1 and 2 are modules of fundamentals subjects that can be easier completed and recognised in other educational systems.
Late Comment	FOCA	<p>66.B.135</p> <p>The competent authority, whenever it approves courses, including multimedia-</p>	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>based training (MBT) courses, which are delivered in a physical and/or virtual environment, shall verify that the aircraft basic training and the aircraft type training comply with Appendix I and Appendix III respectively. The approval procedure shall include the principles and criteria of Appendix IX 'Evaluation method for the multimedia-based training (MBT)'.</p> <p>Due to the Covid-19 pandemic, we observed some strange developments regarding virtual training:</p> <ul style="list-style-type: none"> <li>- When the compulsory schoolroom according 147.a.100 facility requirement has been exchanged with the students' kitchen, living room or bedroom the requirements regarding a controlled environment in terms of noise and distraction can hardly have been met.</li> <li>- When we observe virtual trainings, we could often see students on the phone, actively participating in another chat room or playing games during the training session.</li> <li>- Requests from the organizations to provide two courses on the same day with the justification that with the virtual training they are much faster to convey the content.</li> </ul> <p>In one case we received an indication that even the practical training was conducted virtually (this was reported to EASA). We consider this development problematic, as this has nothing to do with safety and compliance learning. We are not completely against distance learning, but it should not only be an opportunity for the involved stakeholders to save money (facility and expenses for traveling and hotel accommodation). Some of our approved organizations are already cutting off some of the classrooms in the approved locations because they only want to provide distance learning in future. We really ask for more requirements to have a balance of classroom and distance learning as students profit more in classroom (directly asking questions, exchange in break and so on). We highly appreciate clear requirements for Part-147 organizations regarding media based trainings. Otherwise, we are afraid to see a decreasing training quality. We also fear that eventually the industry (in an effort to save more money) will be asking themselves if type-training courses are needed anymore or should it not be possible to pass the examination only.</p>	
Late Comment	FOCA	<p>66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating In the case where the On-the-Job Training is required and the licensing competent</p>	Noted. Unfortunately this change was not accepted by the majority of the comments, therefore EASA decided to revert back to the original text.



COMMENT NUMBER	ORGANISATION	Comment	EASA response
		<p>authority is different from the competent authority of the maintenance organisation, which provides the OJT, the licensing authority shall accept the OJT programme already approved to the organisation (through Chapter 3.15 of the MOE).</p> <p>We welcome this change in the regulation.</p>	
Late Comment	FOCA	<p>147.A.135 Examinations</p> <p>FOCA consider the wording as insufficient as control against cheating are not well defined and many NAA do not have systems to control virtual examinations. We really ask to specify, that only physical locations are possible for assessments and not virtual possibilities.</p>	Noted. This text is the final output of RMT.0281 'New training and teaching technologies'. Refer to CRD to NPA 2014-22.



### 3. Appendix — Attachments

 [KLM - AMC 147.A.130\(a\) Training procedures and quality system \(add 6 table 3 DLS\).pdf](#)  
Attachment #1 to comment [#537](#)

 [NPA 2020-12 Stakeholder proposal, regarding 'Objective b'update.pdf](#)  
Attachment #2 to comment [#10](#)

[French CV CPH MRAeS 2021 \[01\] Réparation et maintenance d'aéronefs..p](#)

