

## Part-66 Comment Response Document

Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
66.A.1	Avionics Mobile Services limited	109	<p>It has been suggested that as there is little difference between the basic requirements between a B1.2 and a B2 license holder that it is impossible to break down a B2 license into an easier qualification (for low end GA). I disagree with this. A person working on below 5,700kg piston aircraft should not have to be examined on CVR,FDR,GPWS,EGPWS, complex autopilots, complex electrical systems, complex entertainment systems, satcom, complex FMS systems, auto land, auto throttle etc. These subjects could be an additional examination should this light aircraft person wish to progress at a later date. In its current proposed form a person signing out a single engine piston aircraft VOR/ILS would need to hold a full B2 license. This is something GA can do without. We need two electronic licenses, a full B2, and a B2.1. A B2.1 licence holder would not need to be examined on those subjects listed but would only be allowed to certify work on piston engine fixed wing and rotary aircraft on those systems listed on his authorisation document. This approach should enable the training time requirements for the B2.1 license course to be considerably reduced.</p> <p>The requirement for a B2 license holder for low end GA aircraft as it stands is a burden that this part of the industry cannot possibly live with.</p>		<p>1- Some aircraft below 5700 kg have complex avionics systems. 2- The B2 basic knowledge requirement permits group rating for aircraft below 5700kg, which once the licence is obtained, reduces the burden on the licence holder.</p> <p>Text not changed.</p>
66.A.1	GAMTA	151	<p>The B2 licence should be complimented by a B2.1 licence. The B2.1 licence would allow the holder to work on Piston Engined fixed and rotary wing aircraft with simple systems that will be classified on the authorisation.</p>		<p>1- Some aircraft below 5700 kg have complex avionics systems. 2- The B2 basic knowledge requirement permits group rating for aircraft below 5700kg, which once the licence is obtained, reduces the burden on the licence holder.</p> <p>Text not changed.</p>
66.A.1	Aircraft Electronics Association	142	<p>Category B2 license does not conform to the existing skill and knowledge basis of general aviation avionics technicians. There is no safety basis or explanation for the enhanced skill and knowledge basis proposed by this regulation.</p> <p>Category B2 should be subcategorized into turbine-powered aeroplanes and helicopters, and pistonpowered aeroplanes and helicopters. The careers in aviation and avionics maintenance are progressive careers where a technician will progress from basic knowledge in entry level general aviation employment to advanced knowledge in corporate or commercial aircraft/avionics maintenance. The provisions of the aircraft maintenance licenses needs to</p>		<p>1- Some aircraft below 5700 kg have complex avionics systems. 2- The B2 basic knowledge requirement permits group rating for aircraft below 5700kg, which once the licence is obtained, reduces the burden on the licence holder.</p> <p>Text not changed.</p>

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			<p>acknowledge this career progression in the complexity of individual licenses.</p> <p>A person working on below 5,700kg piston aircraft should not have to be examined on CVR,FDR,GPWS,EGPWS, complex autopilots, complex electrical systems, complex entertainment systems, satcom, complex FMS systems, auto land, auto throttle etc. These subjects could be an additional examination should the light aircraft maintenance technician wish to progress towards heavy turbine-powered aircraft at a later date.</p> <p>Part 66 should recognize two electronic licenses, a full B2, and a B2.1. The B2.1 license holder would not need to be examined on systems typical to heavy turbine-powered aircraft and would only be allowed to certify work on piston engine fixed and rotary wing aircraft on those systems listed on his/her authorisation document.</p> <p>This approach should enable the training time requirements for the B2.1 license course to be considerably reduced and would more closely parallel the typical avionics technician career path.</p> <p>Recommended Change: Add paragraph (c) which reads: "Category B2 is subcategorized into a full B2 license will full authority and B2.1 limited to piston-powered aeroplane/helicopter aircraft only."</p>		
66.A.1	CFDT, France	144	For the purpose of this Part, the competent authority shall be the civil service in charge of civil aviation of the Member State to whom a person applies for the issuance of an aircraft maintenance licence.	It is clearer to write that the competent authority is a part of the state administration. If the intention of the proposed text were something different, its place were not in an IR but in the regulation because of the Parliament and Council competences.	The competent authority is not necessarily part of the state administration. Text not changed.
66.A.10	LBA	055	There should be a more detailed description which non technical requirements shall be fulfilled by the applicant (e.g. certificate of good conduct). A legal basis is necessary, to require such certificates.		This was not in the original JAR 66 and Part-66 is a technical requirement. Text not changed.
66.A.10	ENAC, Italy	102	The Paragraph doesn't take into consideration the renewal of the license. It is proposed to integrate the paragraph with the renewal case, with the inclusion of the presentation of the EASA Form 19		This is addressed by 66.A.40 and 66.B.120 Text not changed.
66.A.10	CAA, UK	118	No period of validity is specified for compliance with knowledge and practical experience requirements for licence issue. Without such specification, an applicant may claim A.25 compliance from examination credits from previous academic training, but not meet the practical experience requirements until more recently. This allows the applicant to extend the licensing compliance in an unlimited manner		This was not in the original JAR 66 requirement. There are some valid points in the comment but an additional requirement to Part-66 cannot be introduced at this stage without proper consultation.

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			<p>and denies the coherence of the process.</p> <p>Note: The seven year period include in the suggested text was discussed at the JAA JAR-66 Top Ten working group.</p> <p><i>Suggested text:</i>  <i>An applicant who meets the knowledge and practical experience requirements of this part within 7 years immediately before the date of application for a basic licence or the extension of a basic licence is entitled to a licence issued by the competent authority.</i></p>		Text not changed but the issue should be reviewed at a later stage.
66.A.10	GAMTA	151	<p>The initial applications for an aircraft maintenance license and an amendment to the license are made in different manner. While it is clear that the initial application for an aircraft maintenance license is made to the local competent authority, it is not clear which competent authority should be contacted to amend an existing license. If the amendment is made through the local authority, how does the issuing authority receive notification of the amendments? Section 66.A.10 should separately describe the procedures for initial application for a license and the process of applying to amend an existing license.</p> <p>Recommended Change: Amend paragraph (a) to read: "An application for an initial aircraft maintenance license shall be made on EASA Form 19 and in a manner established by the competent authority and submitted thereto. An application to amend an existing aircraft maintenance license shall be made on EASA Form 19 and in a manner established by the local competent authority and submitted thereto. In addition, when the issuing authority is different than the local authority, a copy of the amended license will be sent to the issuing authority."</p>		<p>This comment is not relevant as amendment must be made by the original authority (the competent authority). This is clearly stated in 66.1.</p> <p>Text not changed.</p>
66.A.10	Aircraft Electronics Association	142	<p>The initial applications for an aircraft maintenance license and an amendment to the license are made in different manner. While it is clear that the initial application for an aircraft maintenance license is made to the local competent authority, it is not clear which competent authority should be contacted to amend an existing license.</p> <p>If the amendment is made through the local authority, how does the original issuing authority receive notification of the amendments? Section 66.A.10 should separately describe the procedures for initial application for a license and the process of applying to amend an existing license.</p> <p>Recommended Change: Amend paragraph (a) to read: "An application for an initial aircraft maintenance license shall be made on EASA Form 19 and in a manner established by the competent authority and submitted thereto. An application to</p>		<p>This comment is not relevant as amendment must be made by the original authority (the competent authority). This is clearly stated in 66.1.</p> <p>Text not changed.</p>

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			amend an existing aircraft maintenance license shall be made on EASA Form 19 and in a manner established by the local competent authority and submitted thereto. In addition, when the issuing authority is different than the local authority, a copy of the amended license will be sent to the issuing authority."		
66.A.15	FOCA Switzerland	029	The minimum age to apply for a Part 66 licence is set to 18 years in order to align with ICAO Annex 1 (Ref. §66.A.15). Part 145 requires that certifying staff Category B1 and B2 be at least 21 years old (Ref. §145.A.35(m)). Part M on the other hand allows for the certification privilege by the licence holder on its own for the case of small non-complex aircraft (Ref. M.A.801(b)3). Realistic handling of these different certification privileges (Part 145 versus Part M with respect to minimum age) is not seen.		18 years old is the ICAO minimum requirement. It is correct that Part-145 has more stringent requirements than Part-M on most issues. Text not changed.
66.A.15	CAA, UK	118	The age limit of 18 for licence issue cannot be met in any of the cases detailed in 66.A.30, unless experience was accepted and deemed worthy by applicants under 16 years of age.  Part 145.A.35 (M) sets a minimum age of 21 for all certifying staff. Part 66 should align with this established and accepted age limit. To maintain a differential would suggest certification outside of Part 145 approval was to a lower standard. <i>Suggested text:</i> Delete 18 and add 21.		The age limit of 18 can be met by persons having undergone Part-147 approved training. 18 years old is the ICAO minimum requirement. It is correct that Part-145 has more stringent requirements than Part-M on most issues. Text not changed.
66.A.15	LBA	055	The minimum age of an applicant of 18 years does not correlate with Part 145. A person may hold a Part 66 licence, but will not be allowed to work as certifying staff in a Part 145 organisation until she/he is 21 years old. There should be the same minimum age in both parts.		18 years old is the ICAO minimum requirement. The minimum age is not the same in Part-66 and Part-145 because of the introduction of Part-M, which permits the use of certifying staff below 21 years of age. Text not changed.
66.A.15	Martinair Maintenance	061	Minimum age to apply for AML 18 years, but they become 145 certifying staff at 21 years. It is not clear if this also applies for ECAR 66 Cat A Certifying Staff. We propose to make it possible to become Cat A certifying staff before 21 years.		66.A.20 specifies that category A licence holders may only exercise their privileges within a Part-145 approved maintenance organisation. In turn Part-145 makes it clear that category A certifying staff (like other categories) must have at least 21 years of age. This

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					corresponds to the original JAA requirements Text not changed.
66.A.15	British Airways Maintenance	097	Reduction of the age limit of individuals to 18 to apply for a 66 licence brings concerns over the experience of those individuals.		18 years old is the ICAO minimum requirement. Similar age requirements have been in place in numerous states without raising concerns. Text not changed.
66.A.20	CAA, UK	118	<p>(a) 1. A category "A" licence does not permit the holder to issue Certificates of Release to Service. This privilege is given by a Part 145 organisation.</p> <p>(a) 2. Improve text.</p> <p>(a) 4. Should include aeroplanes at 5700kg and above, and helicopters at or above 3175kg.</p> <p><i>Suggested text:</i></p> <p>1. A Category A aircraft maintenance licence permits the holder to be authorised by a Part 145 organisation to issue Certificate of Release to Service following minor scheduled licence maintenance and simple defect rectification, within the limits of tasks specifically endorsed on the authorisation.</p> <p>2. Change last sentence to: Category B1 includes the appropriate Subcategory A privileges.</p> <p>3. A Category C aircraft maintenance licence permits the holder to be authorised by a Part 145 organisation to issue Certificates of Release to Service following base maintenance..... aeroplanes with a maximum take off mass of 5700kg and above, or helicopters of a maximum take off mass of 3175kg or above.</p> <p>Note: The remainder of the text is duplication from 145.A.30 (J).</p>		There is no need to change the text as 66.A.20(b) requires compliance with Part-145 or Part-M as applicable. Part-145 requires to hold a certification authorisation. Text not changed.
66.A.20	LFV, Sweden	105	<p>It should be more expressed in (a) 1, 2, 3 and 4 that: The holder of an aircraft maintenance licence must have a authorisation as certifying staff from a Part 145 organisation before he/she can issue certificates of release to service (CRS).</p> <p>(a)</p> <p>1. A category A aircraft maintenance licence qualify the holder for an authorisation to issue certificates of release to service following minor scheduled line maintenance and simple defect rectification within the limits of tasks specifically endorsed on the authorisation. The</p>		There is no need to change the text as 66.A.20(b) requires compliance with Part-145 or Part-M as applicable. Part-145 requires to hold a certification authorisation. Text not changed.

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			<p>certification....</p> <p>2. A category B1 aircraft maintenance licence shall qualify the holder for an authorisation to issue certificates of release to service following maintenance, including aircraft structure, powerplant and mechanical and electric systems. Replacement.....</p> <p>3. A category B2 aircraft maintenance licence shall qualify the holder for an authorisation to issue certificates of release to service following maintenance on avionic and electrical systems.</p> <p>4. A category C aircraft maintenance licence shall qualify the holder for an authorisation to issue certificates of release to service following base maintenance on aeroplanes with a maximum....</p>		
66.A.20	ENAC, Italy	102	<p>The proposed text is considered ambiguous and should be modified to include the full privileges of B1 certifying staff.</p> <p>The text of the article should specify that B1 staff privileges include line maintenance for aircraft with a MTOM more than 5700 kg and Base Maintenance for aircraft with a MTOM at or below 5700 kg.</p>		<p>This paragraph should be read in conjunction with 145.A.35(b) and M.A. Subpart H, which together describe the full privileges of certifying staff in each category. Text not changed.</p>
66.A.20	CAA, Denmark	121	<p>From 66.A.20(b) 1 . A holder of an AML may not exercise the certification privileges unless in compliance with the applicable requirements of Part M and/or Part 145. As the licence is a personnel licence and from para 2 the requirement given in ICAO annex 1 is back in Part 66 regulation from JAA 145, it should be possible to use this licence outside EU and JAA countries, on conditions for keeping it valid. This is also relevant for AML holders exercising the privileges inside EU/JAA countries not employed in an organisation under Part M or Part 145 or only employed for a short period so short that they do not receive continuation training. It is the problem for people having a contract as substitute technician. The organisations responsible for substitutes have no system for continuation training. Clarification. Part66.A.20 should have a para (c) saying: Notwithstanding para (b) The holder of an EU AML may not exercise certification privileges as substitute technician or outside EU unless: a) in compliance with Part 66.A.20 (b) 2 and 3</p>		<p>The use of the licence outside the EU jurisdiction is not relevant. Text not changed.</p>

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			<p>b) Have continuation training equivalent to requirements in Part 145 relative to privileges exercised.</p> <p>c) In compliance with EU regulation relative to licence and privileges except for part 66.A.20(b) 1.</p> <p>d) In compliance with ICAO Annex 1.</p>		
66.A.20	CAA, Ireland	154	<p>Part 66.A.20 defines the privileges of the various licence categories.</p> <p>The present JAR 66.20 privileges are causing considerable confusion, particularly in respect of the electrical system and instruments. In fact the only way to make any determination is to use the appendix 1 syllabus as a guide. This is not the best way to do that.</p> <p>It is proposed that part 66.A.20 should be revised to clearly define the categories so that there is no confusion.</p>		<p>66.A.20 text is based upon existing JAR 66.20 text. It is not clear from the comment where the confusion resides and no change proposal is offered. Furthermore it is true that Appendix 1 to Part-66 (the basic knowledge syllabus) provides detailed information on the scope of each licence category.</p> <p>Text not changed.</p>
66.A.20	LFV, Sweden	105	<p>The weight factor in regard of aircraft and helicopters is not used in a consistent way. It sometimes reads: "a maximum take-off mass of 5 700 kg or above" and sometimes: "a maximum take-off mass below 5 700 kg".</p> <p>The ICAO definition should be applied.</p>		<p>Text changed to ensure consistency throughout maintenance regulations.</p>
66.A.20(a)	LBA	055	<p>Category B1 and B 2 aircraft maintenance licence should be limited to line maintenance.</p> <p>"4. A category C aircraft maintenance licence shall permit the holder to issue certificates of release to service following base maintenance on aircraft without any weight limit."</p>		<p>Category C was originally designed for large aircraft and is not adapted to light aircraft environment.</p> <p>Category C is rather management oriented and is needed for complex maintenance packages using complex documentary systems. For light aircraft base maintenance, category B1 and B2 qualifications are found appropriate.</p> <p>Text not changed.</p>
66.A.20(a)(1)	DGAC, France	162	<p>"(a) Subject to compliance with paragraph (b), the following privileges shall apply:</p> <p>1. A category A aircraft maintenance licence permits the holder, when authorised by a Part 145 Maintenance organisation, to issue certificates of release to service following minor scheduled line maintenance and simple defect rectification he has personally performed, within the limits of tasks specifically endorsed on the authorisation.."</p>	<p>The category A has certifying privileges only in a Part 145 organisation.</p>	<p>The proposal is redundant with 66.A.20(b)1.</p> <p>Text not changed.</p>
66.A.20(a)(2) and	British Airways	064	<p>Paragraphs 2 and 3 identify privileges of category B1 and B2</p>	<p>The wording of the paragraphs should</p>	<p>66.A.20 text is based upon</p>

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(3)			aircraft maintenance licence respectively, and include electrical systems as privileges for both categories.	differentiate distinctly between the areas of responsibility for each category so that the areas of responsibility are clear in each case.	existing JAR 66.20 text. The respective areas of responsibility are clarified by Part-66 Appendix 1 (basic knowledge requirement). Text not changed.
66.A.20(a)(4)	ENAC, Italy	102	<i>A category C aircraft maintenance licence shall permit the holder to issue certificates of release to service following base maintenance on aeroplanes with a maximum take off mass above 5700kg or helicopters of a maximum take off mass above 3175 kg. The privileges apply to the aircraft in its entirety.</i> The limitation to large aircraft seems to have no justification, and may lead to problem in the procedures of those maintenance organisation approved for both classes of aircraft.		Category C was originally designed for large aircraft and is not adapted to light aircraft environment. The text is not seen as a burden for those organisations maintaining both large and small aircraft but on the contrary will permit the use simplified released to service procedures for light aircraft. Text not changed.
66.A.20(a)(4)	RAES, UK	107	We note that Article 2 (e) of the Commission Regulation includes the term " a multi-engined helicopter" in the definition of a "large aircraft", while in paragraph 66.A.20 (a)(4) reference to "helicopters of a take off mass of above 3175kg". We believe the paragraph should be redrafted to make reference to, "multi-engined helicopters or those with a take off mass of above 3175kg".		Text changed to ensure consistency with Article 2(e), Part-M and Part-145.
66.A.20(a)1	Assn. of Licensed Aircraft Engineers	010	Add to the last sentence, the following sentence:- "It shall not include fault finding or the use of test equipment to prove a system is serviceable for return to service".		Already covered by Part-145 AMC. Text not changed.
66.A.20(b) 2	CAA, Finland	157	In case of simple light aeroplane (single piston engine, MTOM below 2000kg) in non commercial (private) use, the competent authority should be allowed in certain cases, after evaluating the licence holder's competence, to reduce the requirement of 6 months of maintenance experience in preceding two years. In some EU countries, due to short flying season caused by geographical location and small number of aeroplanes, the fulfilling the minimum 6 months requirement is not possible in practice.		The requirement is 6 months experience every <u>two</u> years. This should be achievable even with short flying seasons. Text not changed.
66.A.20(b)3	CFDT, France	144	he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release to service are written taking in account his/her level of certification.	It is difficult to ask the same level of understanding and communication of a foreign language to different types of people who have not the same needs.	Part-66 text is based upon existing JAR 66 text. The complexity of the language used in technical documentation and procedures is not necessarily linked with the scope of and individual's certification

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					privileges. No text change.
66.A.25	CAA, UK	118	<p>(a) Appendix 1 only refers to Category A, B1 and B2. A Category C applicant has no basic knowledge specification. This means applicants holding an academic degree in a technical discipline may not have been examined on any relevant aeronautical maintenance syllabus.</p> <p>(b) The text suggests an applicant <u>will</u> be given a credit for technical qualifications held. This is not the case, as technical qualifications that may be credited must first be evaluated for compliance with Appendix 1. This task cannot be accomplished at the point of application for a licence, or be assessed from a certificate alone. The criteria to determine acceptance will require detailed review of the administration of the qualification, the syllabus, and the examination process. Furthermore, this process can only be carried out at the National Level. It would not be reasonable to accept technical qualifications from other EU states without the cooperation of the State in which the application is made.</p> <p><i>Suggested text:</i>  <i>Full or partial credit against the basic knowledge requirements and associated examination may be given for any technical qualification assessed by the competent authority to be equivalent to the knowledge standard of this part. Such credits shall be established in accordance with Section B, Subpart E of this Part.</i></p> <p>(c) <i>“Applicants for Category C must demonstrate that an academic degree for qualification under paragraph 66.A.30 3 (iii) meets the syllabus requirements for Category B1 and or B2”.</i></p>		<p>(a) Appendix 1 on the contrary specifies that a category C must by either the B1 or B2 basic knowledge levels.</p> <p>(b) 66.A.25(b) text is based upon existing JAR 66 text. It allows among other things to accept an academic degree based on its equivalence to the B1 or B2 basic knowledge requirements. Proposed new paragraph (c) is more stringent than existing JAA text and would somehow contradict paragraph (b).</p> <p>No text change.</p>
66.A.25	CAA, Finland	157	<p>Postpone implementation until EASA PART 66 Appendix 1 knowledge requirements question data bank is available. Competent authority is unable to carry out examinations in those countries that has no PART 147 approvals.</p>		<p>Final Article 7 of the Commission Regulation includes a two year transition period for Part-66 requirements, which should be sufficient for the preparation of the number of examination questions required by Appendix 2 to Part-66. It should also be noted that there is no requirement for a database of examination questions.</p> <p>Considering the change in</p>

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					Article 7, there is no need to change 66.A.25.
66.A.25(a)	ENAC, Italy	102	An applicant for ... shall demonstrate, by examination <u>conducted by the competent authority or by an organisation approved according to Annex Part 147, to have a level of knowledge....</u>  According to the present text the examination may be conducted by the Authority only, which is not acceptable.		Part-147 specifies that approved basic training organisations have the privilege to conduct examinations that are recognised for the purpose of Part-66; there is no need to repeat this in Part-66. The same approach was taken in JAR 66 Text not changed.
66.A.30	Assn. of Licensed Aircraft Engineers	010	For subcategories B1. and B1.3 or B2.; Suggestion. Experience requirements for the Avionic Engineer should be the same as the requirements for categories B1.2 and B1.4 and B1 and A. If you are avionically minded 3 years experience is quite adequate.		66.A.30 text is based upon existing JAR 66 text. Proposed B2 experience requirements are not substantiated and would not be consistent with the B1.1 experience requirement. No text change.
66.A.30	LFV, Sweden	105	Rename subcategories to categories in (a) 1. and 2 (a) 1. for category A, and categories B1.2 and B1.4: 2. for categories B1.1 and B1.3 or B2: Wrong nomenclature, as B1.1, B1.2, B1.3 and B1.4 are categories.		Text changed.
66.A.30	GAMTA	151	Paragraph (a)(3). Paragraph (a)(3) allows for five years of experience as a B1.2 or B1.4 technicians as identified in paragraph (a)(3)(ii) or academic qualifications as identified in paragraph (a)(3)(iii), however, Section 66.A.45(b) requires that category C technicians must be appropriately type rated. In order to be appropriately type rated a category C technician would need to possess an A or B1.1 or B1.3 license. The criteria in Paragraph (a)(3)(ii) and (iii) are redundant, confusing and should be deleted. Recommended Change: Delete paragraphs (a)(3)(ii) and paragraph (a)(3)(iii)		The intent of 66.A.30 is misunderstood, therefore the proposed change is not relevant. Text not changed.
66.A.30	GAMTA	151	Paragraph (c). Paragraph (c) requires category B2 technicians to be involved with a representative cross section of maintenance tasks on aircraft. For B2 avionics technicians this is an unacceptable burden. Since B2 has combined both avionic and electrical systems, the B2 mechanics would have to regularly work on every aircraft system connected to the electrical system. The typical avionics technician regularly works on communication,		Proposed change to the experience requirements exclude electrical systems and therefore is not consistent with the scope of the category B2 licence as defined by 66.A.20 Text not changed.

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			<p>navigation and radar systems. Their experience should be a cross section of these systems as applicable to their specific work environment.</p> <p>Recommended Change: Amend paragraph (c) to read: "For category A and B1 the experience must be practical which means being involved with a representative cross section of maintenance tasks on aircraft. For category B2 the applicable experience must be practical which means being involved with a representative cross section of communication, navigation, or radar systems either on the aircraft or bench."</p>		
66.A.30 (a) (3)	Aircraft Electronics Association	142	<p>Paragraph (a)(3) defines the experience criteria for licensing as a category C technician. Paragraph (a)(3)(ii) allows for five years of experience as a B1.2 or B1.4 technicians; or academic qualifications as identified in paragraph (a)(3)(iii), however, Section 66.A.45(b) requires that category C technicians must be appropriately type rated. In order to be appropriately type rated a category C technician would need to possess an A or B1.1 or B1.3 license.</p> <p>The criteria in Paragraph (a)(3)(ii) and (iii) are redundant, confusing and should be deleted.</p> <p>Paragraph (a)(3)(ii) and (iii) can be interpreted to mean that a B1.2 or B1.4 technician can become a category C technician without having experience on large turbine-powered aircraft.</p> <p>Recommended Change: Delete paragraphs (a)(3)(ii) and paragraph (a)(3)(iii).</p>		The intent of 66.A.30 is misunderstood, therefore the proposed change is not relevant. Text not changed.
66.A.30(a)	RAES, UK	107	We note that paragraph 66.A.30 (a) clarifies the role of the Category B1 and B2 licence holders in relation to base maintenance, and their relationship with Category C licence holders.		Comment noted; no action required.
66.A.30(a)(2) (ii) & 66.A.30 (a) (1) (ii)	CAA, Ireland	154	<p>Part 66.A.30 (a) (2) (ii) refers to non-aviation technical trade. This does not provide for acceptance of an aviation apprenticeship whereas Part 66.A.3. (a) (1) (ii) does not use the term "non-aviation".</p> <p>It is proposed to amend Part 66.A.30 (a) (2) (ii) by removing the term "non-aviation".</p>		Agreed. Text changed.
66.A.30(a)(3)	ENAC, Italy	102	It should be avoided that the experience in maintenance of small aircraft be used to obtain a "C" AML valid on large aircraft also.		Agreed. Text changed.
66.A.30(a)(3) (i), (ii)	IVW, The Netherlands	099	Twelve month experience as Base Maintenance Support Staff should be a minimum requirement to be incorporated in the total number of years for an applicant for a category C. This was already recommended by JAA-TGL 39, not applicable for Cat C applicant holding a relevant academic degree.		Covered by the AMC. Text not changed.

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66.A.30(a)(3) (iii)	CAA, UK	118	<p>(a) The text mixes two issues, knowledge and experience. As this paragraph only refers to experience the text should be simplified.</p> <p><b>Suggested text:</b></p> <p>(a) 3.(iii) <i>For an applicant holding an acceptable academic degree, three years of experience working in a civil aircraft maintenance environment directly associated with aircraft maintenance, including six months observation of base maintenance tasks.</i></p>		66.A.30 (a) (3) (iii) is based upon existing JAR 66 text and specifies on which basis general maintenance experience can be accepted. Text not changed.
66.A.30(a)(3) (iii)	CAA, UK	118	<p>(e) Inconsistent reference to who accepts maintenance experience. - No period specified for gaining civil experience.</p> <p><b>Suggested text:</b></p> <p>(e) Insert - .... shall be accepted by competent authority..... Amend last paragraph. <i>One year's additional experience of civil aircraft maintenance shall, however, be required to ensure understanding of the civil aircraft maintenance environment.</i></p>		Proposed text is covered by the AMC. Text not changed.
66.A.30(a)(3) (ii)	LBA	055	<p>change "base maintenance support staff" to "B1 and B2 support staff"</p> <p>Use the same wording as in 145.A.35.</p>		Agreed. Text changed.
66.A.30(a)1 (ii) & 2 (ii)	CAA, UK	118	<p>Specify different criteria for intermediate experience requirements for a skilled worker. 1 (ii) refers to 'a technical trade' while 2 (ii) refers to 'a non-aviation technical trade'.</p> <p>Requirement for it to be non-aviation discriminates against those trained within the aviation industry (including aircraft maintenance training/apprenticeship if it was outside Part-147!).</p> <p><b>Suggested text:</b> Delete 'non-aviation' from 2 (ii).</p>		Agreed. Text changed.
66.A.30(a)1.	LBA	055	<p>delete "B1.2 and B1.4"</p> <p>The requirements for practical maintenance experience for aeroplanes turbine and aeroplanes piston should be equivalent.</p>		Not agreed. The turbine engine aeroplane category includes aircraft the technology of which is far more complex than the technology found on piston

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
					engine aircraft. Experience requirements cannot be equivalent. Text not changed.
66.A.30(a)1. (ii)	LBA	055	copy (iii) from 66.A.30(a) 2. to 66.A.30(a) 1. and reduce the time limit to one year. An equivalent wording in 66.A.30(a) 1. and 66.A.30(a) 2. shall be used.		Agreed. Text changed.
66.A.30(a)1. (ii)	LBA	055	change "technical trade" to "non-aviation technical trade" It is important to make it impossible to fulfil (i) and (ii) together in a three years time.		Text harmonised but not as suggested.
66.A.30(a)2.	LBA	055	change "B1.1 and B1.3" to "B1" The requirements for practical maintenance experience for aeroplanes turbine and aeroplanes piston should be equivalent.		Not agreed. The turbine engine aeroplane category includes aircraft the technology of which is far more complex than the technology found on piston engine aircraft. Experience requirements cannot be equivalent. Text not changed.
66.A.30(c)	Aircraft Electronics Association	142	Paragraph (c) requires category B2 technicians to be involved with a representative cross section of maintenance tasks on aircraft. For B2 avionics technicians this is an unacceptable burden. Since B2 has combined both avionic and electrical systems, the B2 mechanics would have to regularly work on every aircraft system connected to the electrical system. The typical avionics technician regularly works on communication, navigation and radar systems. Their experience should be a cross section of these systems as applicable to their specific work environment. Recommended Change: Amend paragraph (c) to read: "For category A and B1 the experience must be practical which means being involved with a representative cross section of maintenance tasks on aircraft. For category B2 the applicable experience must be practical which means being involved with a representative cross section of communication, navigation, radar or electrical systems."		Proposed change to the experience requirements exclude electrical systems and therefore is not consistent with the scope of the category B2 licence as defined by 66.A.20. Text not changed.
66.A.30(d)	CAA, UK	118	Experience required for additional categories/subcategories (2 <sup>nd</sup> sentence) is subjective and conflicts with that quoted in paragraph 66.A.30 3 (b) and Appendix 4.  <i>Suggested text:</i> Delete 2 <sup>nd</sup> and 3 <sup>rd</sup> sentence of this paragraph.		Appendix 4 changed to ensure consistency.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
66.A.30(d)	CAA, UK	118	Clarify recency. The experience should it be in the immediate 12 months before application.  <i>Suggested text:</i> First sentence: <i>For all applicants, at least one year of the required experience must be in the preceding twelve months on aircraft of the category/subcategory for which the initial aircraft maintenance licence is sought.</i>		Recency is clarified in the AMC. No text change.
66.A.30(d)	British Airways Maintenance	097	The existing text refers to 'additional experience' for person from a non civil aviation background.	'Additional experience' is an un-quantified phrase. Inclusion of a clarification potential matrix based on existing knowledge and experience should be included as a reference guide.	Clarification is given by the AMC. No text change.
66.A.30(d)	DGAC, France	162	"(d) For all applicants, at least 12 month of the required experience shall be maintenance experience on aircraft of the category/subcategory for which the initial aircraft maintenance licence is sought gained in the last 7 years, of which 6 month shall be gained in the last 12 month. For subsequent category/subcategory additions to an existing aircraft maintenance licence, the additional maintenance experience required may be less than 12 month, but must be at least three months in the last 12 month. The required experience must be dependent upon the difference between the licence category /subcategory held and applied for. Such additional experience must be typical of the new licence category/subcategory sought. (e) Notwithstanding paragraph (a), aircraft maintenance experience gained outside a civil aircraft maintenance environment shall be accepted when such maintenance is equivalent to that required by this Part. Additional experience of civil aircraft maintenance shall, however, be required to ensure understanding of the civil aircraft maintenance environment. For category A, the additional experience of civil aircraft maintenance should be a minimum of 6 months. For category B1 or B2, the additional experience of civil aircraft maintenance should be a minimum of 12 months"	Implementation problem: Recent experience should be defined, in addition, the experience usually required is not a block of one year, but rather a total of 12 month.	The intent of the proposal is covered by the AMC. Text not changed.
66.A.30(e)	CAA, UK	118	The additional civil experience requirements for experience gained outside civil a/c maintenance environment should be stated.  <i>Suggested text:</i> <i>Amend last sentence: Additional civil aircraft maintenance experience shall, however be required as described in (d) to ensure an understanding of the civil aircraft maintenance environment.</i>		Covered by the AMC. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
66.A.30(e)	ENAC, Italy	102	The present text of the involved paragraph does not give any indication about the experience credit for maintenance activities outside civil aircraft (i.e. military or State aircraft).  The present JAR 66.30(e) text should be used.		The intent of the text is exactly the same as JAR 66.30(e). Text not amended
66.A.40	LFV, Sweden	105	Missprint in last part of (a). Change 66.A.120 to 66.B.120		Agreed. Text changed.
66.A.40	Lufthansa Technik	021	...pursuant to 66.A.120. Must read: 66.B.120 (Typing error)		Text changed.
66.A.40	LBA	055	The validation period of five years for a Part 66 licence is not in accordance with ICAO Annex 1, which requires a validation period of two years. The validation period shall be reduced to two years to be in conformity with ICAO Annex 1.		The ICAO Annex 1 requirement referred to is in fact adequately covered by 66.A.20(b)2. ICAO Annex 1 does not require a revalidation of the experience by the competent authority. Under ICAO Annex 1, this is the responsibility of the licence holder. Text not changed.
66.A.40	CAA, UK	118	(a) This statement suggests the competent authority will check for inconsistencies in the licence in comparison to the records held at each 5 year period or at a time where an amendment is required. This process as described does not deal with licence validity, instead implies that the competent authority will check that the licence has not been amended illegally. This is not sustainable and is inappropriate.  However, a renewal process is valued and affords the issuing authority a check to ensure the applicant can demonstrate compliance with 66.A.20 (b) 2 at the 5 year interval.  <b>Suggested text:</b>  <i>66.A.40 The renewal of the aircraft maintenance licence</i>  (a) <i>"The aircraft maintenance licence becomes invalid five years after its last issue or amendment, unless the holder submits his/her aircraft maintenance licence to the competent authority that issued it, in order to verify compliance with 66.A.20 (b) 2",</i>  (b) <i>New item (d): Inform the competent authority that issued the licence of any change to the personal details.</i>		66.A.40 text is based upon the existing JAR 66 requirement. Suggested text would introduce a new requirement that cannot be incorporated without proper consultation and therefore cannot be accepted at this stage. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
66.A.40	Aircraft Electronics Association	142	<p>Section 66.A.40 does not contain provisions for continued validity while the aircraft maintenance license is in transit to the competent authority which issued the initial license for the 5 year validation.</p> <p>Many regulations require the technician to be in possession of their license in order to exercise the privileges of their license. The provisions of Section 66.A.40 cause a subsequent violation of regulations and/or company policies by requiring the holder of the license to submit the license to the original issuing authority for validation. Under the standardized approach of EASA Part 66, the initial issuing authority may not be the authority of residence and the validation process may take weeks to complete. Some provision for the license to remain valid during the 5 years validation process is necessary.</p> <p>Recommended Change: Add paragraph (d) to Section 66.A.40 which reads: "The aircraft maintenance technicians may demonstrate the validity of their license during the 5 year validation process with a photocopy of their aircraft maintenance license plus all ratings."</p>		The authority must check the original licence. Similar procedure applies for additional type rating endorsements. 66.A.40 provisions does not prevent the licence holder from exercising his certification privileges. Finally 66.A.40 is based upon existing JAR 66 requirement. Text not changed.
66.A.40(a)	CAA, Finland	157	<p>(a) The aircraft maintenance licence becomes invalid five years after its last issue or amendment, 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 66.B.120.</p> <p>Wrong reference to non existing 66.A.120 (correct reference should be 66.B.120)</p>		Agreed. Text changed
66.A.45	LFV, Sweden	105	(a) Missprint. Second sentence duplicated.		Agreed. Text changed.
66.A.45	LFV, Sweden	105	(g) Category C. Not in compliance with 66.A.20 (a) 4.		Agreed. Text changed.
66.A.45	LFV, Sweden	105	<p>(g)</p> <p>1. Manufacture group ratings requires at least 3 years maintenance experience as certifying staff, should be mentioned in the text</p> <p>2. Full group ratings requires at least 5 years maintenance experience as certifying staff, should be mentioned in the text</p>		This is a new requirement that cannot be added at this stage without proper consultation. Text not changed.
66.A.45	LFV, Sweden	105	<p>(g)</p> <p>3. A definition of simple and complex aircraft types should be</p>		The intent is that the Agency will publish a list of complex

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			added.		aircraft in the AMC. Text not changed
66.A.45	Lufthansa Technik	021	same sentence twice, once: "shall", once: "must" (typing error)		Agreed. Text changed.
66.A.45	Lufthansa Technik	021	In addition to the existing paragraph for Cat B1 and B2 add the following note: NOTE: In case of difference training, the difference type training shall cover theoretical training elements and practical training elements, if applicable. The content of the difference training shall be approved by the competent authority.	Argument: Parallel to complete type-rating-courses it must also be allowed to conduct difference/delta type-rating-courses in order to save time and effort. Examples: · A B1 holding a B747-400 with GE CF6 adds a B747-400 with PW4000 on his license. So the training he receives is the PW4000 engine training and the interfaces. The practical part needed afterwards is on the engine and the interface only · A B2 holding an A340 with CFM56 adds an A330 with RR Trent on his license. Since there is no difference in avionic between an A340 and an A330, the training needed will focus on the engine (FADEC and indication) only. Practical hands-on training is unnecessary. · Both B1 or B2 taking difference courses for example A318 to A319/320/321; B737-600/700/800 to B737 300/400/500 or A340-200/300 to A340-500/600. For all these courses there is no need for 2 weeks practical training.	Agreed. Will be addressed in the AMC.
66.A.45	Airbus MTO	015	"The training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination and/or by workplace assessment carried out by an appropriately approved Part145 or Part-147 organisation."  "The training shall include practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training muste be demonstrated by an examination and/or by workplace assessment carried out by an appropriately approved Part145 or Part-147 organisation".  To delete one of those paragraphs.		Agreed. Text changed.
66.A.45	ERA	079	The last sub-paragraph that commences with the phrase "The training shall include practical hands on..." is repeated twice and differ slightly from each other. One should be		Agreed. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			deleted.		
66.A.45	DGAC, France	162	In sub-paragraph (a) what is the meaning of appropriately approved ?	Implementation problem: A part 145 organisation is not approved for training.	Agreed. Will be addressed in the AMC.
66.A.45	DGAC, France	162	Modify sub-paragraph (d) as follows: “(d) Category B1 and B2 approved type training shall include theoretical and practical elements and consist of a aircraft structure, powerplant, mechanical and electrical system course for category B1 and an avionics and electrical system course for category B2. Theoretical and practical training shall comply with Appendix 3 to this Part.”	Editorial: Coherence of the training course with certifying privileges of 66.A.20	Agreed. Text amended although not exactly as suggested.
66.A.45	Assn. of Licensed Aircraft Engineers	010	The majority of the proposals are acceptable. The proposals on Light and General Aircraft would appear to alleviate JAR 147 training in as much as it is levelled at the basic knowledge of simple types of aircraft and components. The grouping of types is also acceptable under manufacturers as the ethos should be acceptable to competent authorities. I am not too happy with grouping of a range of manufacturers after 3 type ratings. I believe for safety's sake this should be looked at again. Ethos between manufacturers may not be the same. □		Comment noted. No action required.
66.A.45(a)	CAA, UK	118	Amend (a) to reflect comment in 66.A.20 (a) 1 and simplify text.  <i>Suggested text:</i>  (a) “The holder of a Category A aircraft maintenance licence may only exercise privileges of his authorisation on a specific aircraft type following satisfactory completion of practical hands on training and theoretical training as appropriate for each task authorised. Satisfactory completion of training shall be demonstrated by an examination and/or by work place assessment carried out by an appropriately approved part 145 or part 147 organisations.		Text simplified but reference to the authorisation not added as it would repeat 66.A.20(b).
66.A.45(a)	CAA, UK	118	(a) Duplication of para 2. <i>Suggested text:</i> (a) Delete 3 <sup>rd</sup> paragraph.		Text changed.
66.A.45(a)	IVW, The Netherlands	099	CAA-NL sees no reason not to restrict the privilege of practical training Part a45 approved AMO's only, Part M subpart F AMO's should also be included. CAA-NL		Part-M organisations are not allowed to use category A certifying staff therefore there

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			suggests to ad Part M subpart F approved organisation to the last sentence of this paragraph. ( ps. The last two sentences are printed twice.)		is no need for them to conduct category A task training. Text not changed.
66.A.45(a)	Tyrolean Airways	100	The second subpara commencing with „the training shall include.....“ is repeated/redundant.		Agreed. Text changed.
66.A.45(a)	Wideroe, Norway	028	The section starting with: “The training shall include practical hands on.....” is written twice. (typing error?)		Agreed. Text changed.
66.A.45(a)	CAA, Finland	157	The text of the second paragraph duplicated in error in the third paragraph (only one word difference).		Agreed. Text changed.
66.A.45(a)	LBA	055	To approve the Part 145 organisation for task training an AMC in Part 145 is needed (see comment to 145.A.75(a)). The AMC shall require that the Part 145 organisation should fulfil the requirements of Part 147 for the task training of category A maintenance personnel.		Agreed. Will be clarified in the AMC. Text not changed.
66.A.45(a)	LBA	055	To approve the Part 145 organisation for task training an AMC in Part 145 is needed (see comment to 145.A.75(a)). The AMC shall require that the Part 145 organisation should fulfil the requirements of Part 147 for the task training of category A maintenance personnel.		Agreed. Will be clarified in the AMC.
66.A.45(a)	CAA, Denmark	121	Double text, use the text with... must be demonstrated by an examination and/or workplace assessment....		Agreed. Text changed.
66.A.45(c)	CAA, UK	118	There is no limit on the time that a type course is valid for. Since the value of the training diminishes over time if it is not put into practice, there should be a time limit between completion of training and issue of the type rating.  <i>Suggested text:</i> Add new paragraph (i): Any type course taken to qualify for the issue of a type rating must have been completed within three years immediately before application for that type rating.		66.A.45 is based upon existing JAR 66 requirement. Suggested text includes a new requirement that cannot be included without proper consultation. Text not changed.
66.A.45(d)	British Airways Maintenance	097	This paragraph refers to a mechanical course for B1 and an avionic course for B2.	ATA 104 is the industry standard of training to which no reference has been made. Instead the new amendment refers to specific written text requirements.	Reference to ATA 104 is made in the Guidance Material. Text not changed.
66.A.45(d)	Airbus MTO	015	In addition to the existing paragraph for Cat B1 and B2 , add	To take into account the “difference training”	Agreed. Will be addressed by

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p>the following note:</p> <p>NOTE: In case of difference training, the difference type training shall cover theoretical training elements and practical training elements, if applicable. The competent authority shall approve the content of the difference training.</p>		the AMC.
66.A.45(e)	Airbus MTO	015	<p>In addition to the existing paragraph for Cat C the following note:</p> <p>NOTE: In case of difference training, the difference type training shall cover theoretical training elements approved by the competent authority.</p>	To take into account the "difference training"	Agreed. Will be addressed by the AMC.
66.A.45(e)	Eurocopter France, Jean-Francis Suquet	004	(e) Category C approved type training shall comply with Appendix 3 to this Part. In the case of a category C person qualified by holding an academic degree as specified in 66.A.30 (a), (3), (iii), the first relevant aircraft type theoretical training shall be at the category B1 or B2 level. <b><i>The other aircraft theoretical knowledge shall be evaluated according to the level 1 "General Familiarisation" of Appendix 3.</i></b>	The current text did not specify anything about the knowledge required other than first type training.	The knowledge required for subsequent type training is addressed by the first sentence of the paragraph (general case). Text not changed.
66.A.45(f)	CAA, UK	118	<p>Assumes that practical aspects of type training will be carried out by Part 147 organisations as an integrated course.</p> <p>Suggested text: Add 'theoretical' between 'type' and 'training'.</p> <p>Consistency issue. Use " Satisfactory completion".</p> <p>Suggested text: Satisfactory completion of approved type training, as.....</p>		<p>- The practical element must also be assessed (see Appendix 3 to Part-66).</p> <p>- The term satisfactory is redundant with "demonstrated by an examination".</p> <p>Text not changed.</p>
66.A.45(g)	CAA, UK	118	<p>(g) <i>"Notwithstanding paragraph (b), the holder of a Category B1 or B2 aircraft maintenance licence may also ....."</i></p> <p>(g) 2. This should reflect three aircraft <u>manufacturers</u> not three aircraft types. This would require less manufacturers experience that someone qualified for a manufacturers group in (g) 1. It should state that the 2 types of the manufacturer or the 3 types needed for the full group have to be endorsed on the licence first before the group is given. There is no value endorsing the last type required if the group is to be given.</p> <p><i>Suggested text:</i></p>		<p>The first part of the proposal would result in requiring 6 aircraft type qualification for a group rating, instead of 3. No proper justification is given for such a drastic change.</p> <p>Text not changed.</p> <p>The intent of second part of the proposal (substituting "endorse" by "qualified for") is accepted.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p>66.A.45 (g) 1 Delete 'endorsement of' and substitute 'qualifying for'.</p> <p>66.A.45 (g) 2 "Full group ratings may be granted after qualifying for three manufacturers groups representation of the full group". Example 1: C152 and C210 = limitation Cessna aircraft rating.</p> <p>Example 2: Piper aircraft and Cessna aircraft and Mooney aircraft = aeroplane Single Piston engine – metal structure (No limitations).</p>		Text changed, although not exactly as proposed.
66.A.45(g)	CAA, Finland	157	Group ratings should be used only for single engine aeroplanes MTOM below 2000kg. All helicopters regardless of their MTOM should need a separate type rating. This is due to safety reasons: The fact is that the errors in maintaining helicopters can have more severe results than errors in aeroplane maintenance.		Proper justification for the change missing. Group ratings for helicopters are envisaged in conjunction with the basic knowledge level requirements of Appendix 1 to Part-66. Text not changed.
66.A.45(g)(1)	Rolls Royce Germany	087	Change: "Manufacturer Group" into "Type approval group", because there are several cases where the same type design is used by different manufacturers (license production) and the rating should be related to the type design and not dependent on the manufacturing organisation.		The term "manufacturer Group" is kept but the issue will be clarified in the AMC.
66.A.45(g)(2)	ENAC, Italy	102	" However , no full group rating may be granted to B1 multiple turbine engine aeroplanes <u>and helicopters</u> ,.....".  The modification should avoid that a full group rating is instituted for multiengine helicopters. Multiengine helicopters are high complexity aircraft and the maintenance procedures may greatly vary with type and manufacturer.		The fact that twin engine helicopters are generally complex helicopters and therefore should not be subject to group ratings, is accepted. Text changed.
66.A.45(g)(2)	Assn. of Licensed Aircraft Engineers	010	(g) 2. Should be deleted in its entirety. (See preamble to submissions). The sentence dealing with Multiple Turbine Engined Aeroplanes should be added to (g) 1.		No justification provided. Text not changed.
66.A.45(g)(2)	CAA, Denmark	121	For Manufactory and Full group rating a clear acceptance system for exercising the privileges of new types under a group rating must be defined as well as the responsibility of the AML holder for exercising these privileges. Clarification needed for this area.		The issue is covered by 66.A.20(b)2 for continuing experience and 66.A.45(g) for determination of complexity of the new type. Text not changed.
66.A.45(g)(3)	LBA	055	No group ratings should be allowed for aircraft with turbine		Some simple turbine aircraft

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			engines. These aircraft are too complex for a group rating.		may be adequately covered by group ratings. Furthermore subparagraph (g) specifies that complex small aircraft are subjected to type ratings only. Text not changed.
66.A.45(h)	CAA, UK	118	<p>(H) This paragraph should include a provision to accept type training in lieu of type examination. While type training is not essential, organisations have set up Part 147 type training for this weight of aircraft at industry's request. This should be an acceptable process for type rating purposes, and recognised as a preferred option to type examination.</p> <p>Reference to paragraph 3 unnecessary.</p> <p>A new appendix is necessary to specify which aircraft are considered complex and require a type training course. Without this specific reference an applicant may presume his group ratings already cover the type in question.</p> <p><i>Suggested text:</i></p> <p>(H) <i>"Notwithstanding paragraph (C), ratings on aeroplanes with a maximum take off mass of 5700 kg or less and helicopters with a maximum take of mass of 3175 kg or less shall be granted, subject to satisfactory completion of the relevant Category B1 or B2 aircraft type examination or approved type training course, and demonstration of practical experience on the aircraft type, unless the Agency has determined the aircraft is complex as listed in appendix **, where approved type training is essential."</i></p>		<p>The intent was indeed that paragraph (h) would not exclude paragraph (c) type training option.</p> <p>Text changed, although not exactly as proposed.</p> <p>The list of aircraft types will be included in the AMC.</p>
66.A.45(h)	CAA, Finland	157	<p>Notwithstanding paragraph (c), ratings on aeroplanes with a maximum take off mass of 5700 kg or less and helicopters with a maximum take off mass of 3175 kg or less shall be granted, subject to satisfactory completion of the relevant category B1 or B2 aircraft type examination and demonstration of recent practical experience after completing the training course on the aircraft type, unless the Agency has determined that the aircraft is complex, where paragraph 3 approved type training is required.</p> <p>Reason for this change: If the practical knowledge has been gained too long ago, most or part of it may have been forgotten and knowledge may not be up to date.</p>		<p>Recent experience is covered by 66.A.20(b)2.</p> <p>Text not changed.</p>
66.A.45(h)	CAA, Finland	157	<p>Notwithstanding paragraph (c), ratings on aeroplanes with a maximum take off mass of 5700 kg or less and helicopters</p>	<p>If the practical knowledge has been gained too long ago, most or part of it may have</p>	<p>Recent experience is covered by 66.A.20(b)2.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			with a maximum take off mass of 3175 kg or less shall be granted, subject to satisfactory completion of the relevant category B1 or B2 aircraft type examination and demonstration of recent practical experience after completing the training course on the aircraft type, unless the Agency has determined that the aircraft is complex, where paragraph 3 approved type training is required.	been forgotten and knowledge may not be up to date.	Text not changed.
66.A.45(h)	CAA, Ireland	154	Part 66.A.45 (h) introduces the requirement for type examinations for aircraft under 5700 kgs and for helicopters under 3175 kgs. The use of multi-choice questions is recognized by JAR 66 as the only way of ensuring that the same standards are applied in all EU member States. It is proposed that EASA should provide a central question bank for each aircraft type in the relevant weight categories.		The possible development of a central examination database by the Agency is not relevant to the consultation.
66.A.45(h)(3)	Assn. of Licensed Aircraft Engineers	010	(h) 3. "Aircraft type practical experience shall include a representative cross section of maintenance activities relevant to the category." Add following few words, "as proven by the applicants personal engineering log book".		This is covered by the AMC. Text not changed.
66.A.45(h)(3)	CAA, Finland	157	Aircraft type recent practical experience shall include a representative cross section of maintenance activities relevant to the category.	If the practical knowledge has been gained too long ago, most or part of it may have been forgotten and knowledge may not be up to date.	Recent experience is covered by 66.A.20(b)2. Text not changed.
66.A.50	ENAC, Italy	102	The JAR 66.50 should be used instead of the proposed text, because it is not sufficiently clear the responsibility to avoid that a Certifying Staff not medically fitted issues Certificate of Release to Service.		66.A.50 clearly puts the responsibility on the licence holder and removed the ambiguity caused by the terms "know or suspect". It is therefore considered better than the original JAR 66 text. Text not changed.
66.A.50	Assn. of Licensed Aircraft Engineers	010	This is not good enough. Self monitoring does not work. It has to be the management who will decide fitness for work. The Americans carry out this requirement correctly. If you really want this paragraph added you must put some fire into its wording, or forget about it. As it is written there is absolutely nothing to back it up. No one will quit work because they think they are not fit, the fear of dismissal is always there. What support will E.A.S.A. give to the engineer who suspends himself from duty? □		At the moment there is no such monitoring programme, therefore self monitoring is the only possibility. Text not changed.
66.A.50	British Airways Maintenance	097	The statement suggests 'A licence holder should not exercise the privileges of his/her licence if their physical or mental condition makes them unfit'	Previously the word 'suspects' has been included in such a statement. If a persons 'mental' condition renders them unfit, it is, by then, too late to make a considered judgement. Addition of 'suspects' pre-empts	The term "suspects" made the requirement weaker. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				this to some degree.	
66.A.50	GAMTA	151	The proposed EASA language of section 66.A.50 reduces the level of safety established by JAR 66.50. There is a subtle difference between having a condition which renders the technicians unfit verses having the technicians take preventive measures if they suspect that a condition may compromise there ability to safely exercise the privileges of their certificate. Recommended change: Replace the proposed language of 66.A.50 with the original JAR 66.50 language so that section 66.A.50 reads: "Aircraft maintenance license holders shall not exercise their privileges if they know or suspect that their physical or mental condition renders them unfit to exercise such privileges".		With the original JAR 66.50 provision, a technician could argue he did not suspect his physical condition was not appropriate. New text is more stringent. Text not changed.
66.A.50	DGAC, France	162	Propose to delete paragraph	Impracticable: This paragraph should be reserved for the time being. We consider that this text is not mature enough to become a community Regulation as it interferes with general provisions of the social legislation concerning workers capacity.	66.A.50 is based upon existing JAR 66 text. It deals with the individual's responsibility and does not require the involvement of the employer as no medical testing is required. Finally EU law prevails over National law. Text not changed.
66.A.50	Aircraft Electronics Association	142	The proposed EASA language of section 66.A.50 reduces the level of safety established by JAR 66.50. There is a subtle difference between having a condition which renders the technicians unfit verses having the technicians take preventive measures if they suspect that a condition may compromise there ability to safely exercise the privileges of their certificate. Recommended change: Amend the proposed language of 66.A.50 with the original JAR 66.50 language so that section 66.A.50 reads: "Aircraft maintenance license holders shall not exercise their privileges if they know or suspect that their physical or mental condition renders them unfit to exercise such privileges".		With the original JAR 66.50 provision, a technician could argue he did not suspect his physical condition was not appropriate. New text is more stringent. Text not changed.
66.A.50	CFDT, France	144	Too difficult to implement taking into account the medical secrecy		Medical secrecy is not the issue. This paragraph is about individual responsibility, not medical testing. Text not changed.
66.A.50 & AMC 66.A.50	CAA, Denmark	121	We have until now had the attitude that medical approval or control for mechanics/technicians are not needed. But seen in the light of Estacy and other artificial produced		This is a new requirement that cannot be included at this stage without proper

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			drugs and the know problems with alcohol, we feel it is time for a new attitude or approach. As a start we could extend AMC 66.50 with para 5 saying. 5. Holders of an Aircraft Mechanical Licence exercising the privileges of that licence shall on request from the Competent Authority or the Agency undergo any medical test or examination the Competent Authority or the Agency finds necessary for being able to decide if a situation exist in conflict with the above item 1, 2, 3, 4 to this paragraph and to decide if a situation exist to render the licence invalid.		consultation. Text not changed.
66.A.70	IVW, The Netherlands	099	Conversion provisions. Extend protected right according to TGL 32, there is personnel who hold the qualification and experience required to exercise certification privileges but, due to another job assignment, are not currently exercising or have not yet exercised these certification privileges. These rights should also be protected rights. CAA-NL suggests to include the relevant wording of TGL 32 into this paragraph, to make it legal.		The term "qualification valid in a Member State" intends to cover this case.  The conversion provision has no time limit.  Text not changed.
66.A.70	ENAC, Italy	102	The transition phase does not give any grandfather right to those certifying staff presently under training. According to the proposed text, those people should ask again for AML Part 66, and no training credit has been defined. Italian industry would greatly hurt by the proposed text.  JAR 66.1 text should be adopted instead of the proposed text.		Agreed. Original provisions for JAR 66.1(e) were missed.  New subparagraph (b) in introduced along the lines of JAR 66.1(e).
66.A.70	Austro Control	081	66.A.70 should read "The holder of a certifying staff qualification and/or an national aircraft maintenance licence valid in a member state, prior..."	Paragraph should clearly state that also national maintenance licences are subject to be converted; some European countries have a national licensing system.	The term "qualification valid in a Member State" intends to cover this case.  The conversion provision has no time limit.  Text not changed.
66.A.70	LBA	055	A procedure for transfer of national licences or national privileges not issued in accordance with JAA procedures to Part 66 category A, B1, B2, and C is needed. A regulation for grandfather rights holders according JAR-66 is missing. As transfer period of JAR-66 was until 2011.		The term "qualification valid in a Member State" intends to cover JAR 66 licences and pre JAR 66 qualifications.  The conversion provision has no time limit. Text not changed.
66.A.70	Atitech S.p.A. - Alitalia Group	111	Add new paragraph following 66.A.70 to recognize "personnel undergoing a course of approved basic or type training at the date of effectivity of JAR66 (par. 66.1.e and	According to JAR66.1 and 66.3 personnel "under training" at the date of JAR 66 has been declared to Authority and accepted.	Agreed. Original provisions for JAR 66.1(e) were missed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			66.3)".	It is not acceptable and uneconomical for the industry to cancel this transitional measure.	New subparagraph (b) in introduced along the lines of JAR 66.1(e).
66.A.70	Alitalia	067	Add new paragraph following 66.A.70 to recognize "personnel undergoing a course of approved basic or type training at the date of effectivity of JAR66 (par. 66.1.e and 66.3)	According to JAR66.1 and 66.3 personnel "under training" at the date of JAR 66 has been declared to Authority and accepted. It is not acceptable and uneconomical for the industry to cancel this transitional measure.	Agreed. Original provisions for JAR 66.1(e) were missed.  New subparagraph (b) in introduced along the lines of JAR 66.1(e).
66.A.70	DGAC, France	162	A personnel authorised under article 5 of the regulation to exercise certification privileges in accordance with national regulations valid in a Member State, prior to the date of entry into force of this Part, is entitled to an aircraft maintenance licence issued by the competent authority without further examination subject to the conditions specified in 66.B.130. Where necessary, the aircraft maintenance licence shall contain technical limitations in relation to the scope of the pre-existing qualification.	Impracticable: It is necessary to take into account persons who will be in the course of a qualification at the time of entry into force of Part 66. See also comment to article 5 of the regulation. A drafting similar to 66A.10(b) seems more appropriate.	Agreed. Original provisions for JAR 66.1(e) were missed.  New subparagraph (b) in introduced along the lines of JAR 66.1(e).
66.A.75	ERA	079	Replace the word "that" with "than" on the first line.		"that" not found in the text. Comment not relevant. No text change.
66.A.75	LBA	055	It does not correlate with EU regulation 1592/2002, Part M and Part 145, if maintenance personnel is holding licences in accordance with national regulation. Therefore a common regulation for technical maintenance personnel for these types of aircraft (gliders, balloons, etc.) shall be published as soon as possible, because a European standard is needed in this field.		Comment noted. No action required at this stage of the consultation.
66.A.75 66.A.80	DGAC, France	162	Propose to delete paragraph	Regulation 1592/2002 only requires implementing rules for certifying staff if required to hold a certificate. For the time being it has not been decided yet if harmonisation and the requirement for a certificate was necessary for certifying staff of aircraft other than aeroplanes and helicopters and of helicopters. Having Subpart B and C included in the regulation prejudice decision on that subject, which is not desirable.	Text is found compatible with Regulation 1592/2002. Text not changed.
66.A.80	ERA	079	Add the letter s to "component" on the first line.		Comment not relevant
66.A.80	ERA	079	This paragraph makes reference to component certifying. It was my understanding from an earlier MST meeting that this requirement had been dropped. Can the Agency please		66.A.80 makes reference to national requirement therefore

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			explain why the topic appears within this Part 66?		in practice there is no change from existing JAR 66.  Text not changed.
66.A.80	Martinair Maintenance	061	<p>ECAR 66 Subpart B and ECAR 66 Subpart C</p> <p>In ECAR 145 the national standard for NDT (EN 4179) is removed from text as it is not in control of EASA, why mention the national standards (also not in control of EASA) on:</p> <ul style="list-style-type: none"> <li>- Aircraft other than aeroplanes and helicopters in subpart B and</li> <li>- Components in subpart C.</li> </ul> <p>We suggest to deleted the subparts.</p> <p>Also, we as ECAR 145 organisation feel no need for regulations on licensing component maintenance personnel. Part 21, Part 66 and Part 145 and the requirement for Form One provide adequate assurance in this matter.</p>		66.A.80 makes reference to national requirement therefore in practice there is no change from existing JAR 66Text not changed.
66.A.80	LBA	055	It does not correlate with EU regulation 1592/2002, Part M and Part 145, if maintenance personnel is holding licences in accordance with national regulation. Therefore a common regulation for technical maintenance personnel for these components shall be published as soon as possible, because a European standard is needed in this field.		Comment is noted, however the text is found compatible with Regulation 1592/2002. No action required at this stage of the consultation.
66.A.80	Rolls Royce Germany	087	The latest amendment to JAR66 has been ready for release and should be implemented here. To leave this with the NAA generates an unacceptable situation due to the different levels of qualification for component certifying staff and causes commercial disadvantages to organizations from several member states.		Comment noted. No action required at this stage of the consultation.
66.B.85(a)	CFDT, France	144	A Member State shall designate a civil service known as "competent authority" with allocated responsibilities for the issuance, continuation, amendment, suspension or revocation of licences. This competent authority shall establish documented procedures and an organisational structure.	It is clearer to write that the competent authority is a part of the state administration. If the intention of the proposed text were something different, its place were not in an IR but in the regulation because of the Parliament and Council competences.	The competent authority is not necessarily part of the State administration. Text not changed.
66.B.87	Tyrolean airways	100	Replace the words „... may use ....“ with „... shall use ....“ in the first line of the para. to avoid different standards applied in different member states		In line with Regulation 1592/2002 Articles 13 and 14. Text not changed.
66.B.90(b)	CAA, UK	118	(b) This should include records of assessment of any qualification credited towards a Part 66 licence and any assessment of an academic degree accepted for Category C.		Agreed. Text changed except for 5(b), which is included in 5(a).

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p><i>Suggested text:</i></p> <p>5. Change 'authoritys' to 'authorities' (<i>typographical error</i>).</p> <p>a. <i>Copies of examination credit reports required by 66.B.150.</i></p> <p>b. <i>Copies of assessments made to determine the acceptance of academic degree for Category C.</i></p> <p><i>and (e) to include 8 and 9.</i></p>		
66.B.90(b)(2)	IVW, The Netherlands	099	CAA-NL does not see the necessity to hold a paper copy of the licence, but finds it essential that the authority has secured to have the information on record, possibly on a computer database including separate and secure back-ups. CAA-NL suggests to change the wording of 66.B.90(b)(3) as follows: <b>"the detailed information of the maintenance licence including any changes."</b>		The AMC will specify that copy means paper copy, computer copy or a combination of both methods. Text not changed.
66.B.90(b)(5)	ERA	079	The word "authoritys" on line 1 should be replaced with "authorities".		Agreed. Text changed.
66.B.90(c)	LBA	055	The time limit of 5 years for record-keeping is different to time limit of 4 years in accordance with 145.B.55. This may cause problems in the future, when Part 66 Subpart C licences will be issued according EASA rules.		5 years corresponds to 1 cycle of licence validity renewal. Text not changed.
66.B.90(f)	CAA, UK	118	(f) National legislation prevents the disclosing of certain personal information to other parties.  <i>Suggested text:</i>  Delete 'All records' and substitute 'Appropriate information'.  Note of caution: This may contradict the data protection act.		Text is in compliance with Regulation 1592/2002 Article 11 on Information network. Text not changed.
66.B.90(f)	DGAC, France	162	Delete 66.B.90(f) and add a new paragraph 66.B.XX Exchange of information: 1.1 " 66.B.XX Mutual exchange of information (a) In order to contribute to the improvement of aviation safety, the competent authorities shall participate in a mutual exchange of all necessary information. (b) The information exchanged shall be used solely for the purpose of this Part and its access shall be limited to the participating competent authorities. (c) Without prejudice to the competencies of the Member States, in the case of a potential safety threat involving	Basic principles: Coherence with Part M  No reason to give unlimited access to an authority's record system outside mutual exchange of information. Unlimited access is restricted to the inspection power of the Agency (as specified in article 45 of regulation 1592/2002).	Text is in compliance with Regulation 1592/2002 Article 11 on Information network. Text not changed.

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			several Member States, the concerned competent authorities shall assist each other in carrying out the necessary oversight action."		
66.B.95	IVW, The Netherlands	099	Repetitive and long exemptions shall be notified to the agency and the member states. CAA-NL suggests some standard procedures should be included here.		This would repeat Article 10, 3 of the basic regulation. No text change.
66.B.100	Assn. of Licensed Aircraft Engineers	010	Add another short sentence:- "Such experience to be verified by perusal of the applicants personal engineering log book".□		66.B.100 is based upon existing A&GM Chapter 22 text. The introduction of a logbook would be a new requirement which would necessitate additional consultation. Text not changed.
66.B.100(b)	CAA, UK	118	(b) As applicants may have credits for certain modules of the syllabus, the procedures should reflect their validity in lieu of examination.  <i>Suggested text:</i> (b) <i>The competent authority shall verify an applicant's examination status and/or confirm the validity of any credits to ensure that all required modules of appendix 1 have been met as required by this Part.</i>		Agreed. Text changed.
66.B.105	CAA, UK	118	It is not clear what this procedure is designed to provide. It states that the competent authority prepares and issues the licence. Since this is the legal obligation of the issuing authority, any preparation by industry is entirely irrelevant to the process. Furthermore this does not appear as a privilege of Part 145. The inclusion of this procedure is a legacy from the original JAR-66 and should be omitted at this time.  <i>Suggested text:</i> <i>Delete 66.B.105.</i>		66.B.105 is based upon existing text from A&GM Chapter 22, which has been implemented and proved satisfactory. There is no objective reason to delete this provision. Text not changed.
66.B.105	IVW, The Netherlands	099	CAA-NL is confused on this issue. On what basis can a Part 145 AMO been approved for this activity?		Agreed. The term "approved" is replaced by "authorised".
66.B.110(c) & (d)	CAA, UK	118	(c) & (d) refer to the state in which licence holder first qualified. This may not be the state which issued the current licence.  <i>Suggested text:</i>  In (c), delete all following 'other than the Member State' and add 'which issued the current licence, the application shall be		Suggested text is not relevant because licences can only be amended by the Member State who originally issued the licence. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p><i>sent to the issuing Member State.'</i></p> <p>In (d), delete <i>'in which he/she first qualified'</i> and substitute <i>'which issued the current licence'</i> and delete <i>'Member State of first qualification'</i> and substitute <i>'issuing Member State'</i>.</p> <p>(d) It is the applicant's responsibility to claim credit with his original licensing authority. This does not involve the Part 145 organisation or require their completion of the Form 19.</p> <p><i>Suggested text:</i></p> <p>(d) Where the applicant for amendment of the basic categories qualifies for such variation via 66.B.150 in a Member State other than the Member State which issued the licence, the application shall be sent to the Member State which issued the licence.</p>		
66.B.110(d)	IVW, The Netherlands	099	Typo: the reference should be 66.B.105.		Agreed. Text changed.
66.B.115	CAA, UK	118	Paragraph (B) repeats the content of (a). <i>Suggested text:</i> Delete existing (b) and renumber (c) as (b).		Paragraph (b) transferred to the AMC and (c) renumbered.
66.B.115(b)	CAA, Ireland	154	This paragraph does not cater for the non-complex aircraft where a type examination is required. It is proposed to amend this paragraph by adding "or type examination, in the case of non-complex aircraft" after the word: elements.		Agreed. Text changed.
66.B.120	CFDT, France	144	<p>(a) The holder of an aircraft maintenance licence shall complete the relevant parts of EASA Form 19 and submit it with the holder's copy of the licence to the competent authority that issued the original aircraft maintenance licence, unless the Part-145 approved maintenance organisation has a procedure in its exposition whereby such organisation can submit the necessary documentation on behalf of the aircraft maintenance licence holder.</p> <p>(b) The competent authority shall compare the holder's aircraft maintenance licence with the competent authority file and verify for any pending 66.A.65 revocation, suspension or variation action. If the documents are identical and no action is pending pursuant to 66.A.65, the holder's copy shall be renewed for five years and the file endorsed accordingly.</p> <p>(c) If the competent authority file is different from the aircraft maintenance licence held by the licence holder: 1. the competent authority shall investigate the reasons for such differences and may choose or not to renew the aircraft maintenance licence.</p>	<p>(a) It is not mandatory that the Part 145 organisation submits the Form 19</p> <p>(b) Self explanatory</p>	Agreed. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			2. the competent authority shall inform both the licence holder and the affected Part-145 or Part-M approved maintenance organisation of such fact and shall, if necessary, take action under paragraph 66.A.65 to revoke, suspend or amend the licence in question.		
66.B.120	Assn. of Licensed Aircraft Engineers	010	Rewrite (c) as follows:- "The competent authority shall investigate the reasons for such differences and after consultation with the licence holder and approved maintenance organisation, may choose not to renew the aircraft maintenance licence."	There has to be a two way dialogue between parties when such a serious breach is discovered.	Investigation involves dialogue when necessary. Text not changed
66.B.120	Tyrolean Airways	100	Reference to 66.A.65 is wrong. This para does not exist in this document		Agreed. Text changed.
66.B.120(a)	LBA	055	change "shall" to "may" The AMO may employ personnel with a Part 66 licence but will not necessarily issue an authorisation certificate to all such staff.		Agreed. Text changed.
66.B.120(b)	ENAC, Italy	102	The reference to 66.A.65 appears to be wrong. It should be 66.B.155		Agreed. Text changed.
66.B.120(b)	CAA, Finland	157	The competent authority shall compare the holder's aircraft maintenance licence with the competent authority file and verify for any pending 66.B.155 revocation, suspension or variation action. If the documents are identical and no action is pending pursuant to 66.B.155, the holder's copy shall be renewed for five years and the file endorsed accordingly.  Incorrect reference to PART 66.A.65 which does not exist. The correct reference should be to PART 66.B.155.		Agreed. Text changed.
66.B.120(b) and (c)	CAA, UK	118	(b) and (c) These procedures refer to an administrative procedure to corroborate records with an issued licence, and revocation as prescribed by 66.B.155. See comments on 66.A.40  A renewal procedure is required to address technical compliance issues. This should require the applicant to demonstrate 6 months experience in 24 months as required by 66.A.20. ICAO Annex 1 requires the issuing authority to check currency of experience that can be achieved at licence renewal. The renewal process proposed does not include any check on current experience. This may be acceptable when working under a Part 145 certification authorisation and the Part 145 organisation takes responsibility for ensuring compliance, there is no similar check when certifying under the licence itself. For those applicants who		Suggested Subpart B text is not in line with the Subpart A requirement (see corresponding comments on 66.A.40) Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p>due to their role in industry cannot meet the experience requirement, the licence will expire but can be renewed at a future date by meeting the experience requirements specified.</p> <p><i>Suggested text:</i></p> <p><i>(b) The competent authority shall check that the holder has recorded sufficient maintenance experience to comply with 66.A.20 (b) 2 over the preceding 5 year period, and when satisfied shall renew the licence for a further 5 years and amend the records accordingly.</i></p> <p><i>New: (c) Where the applicant cannot demonstrate compliance with 66.A.20 then a further period of experience will be necessary before the licence can be renewed.</i> Delete (c) and (c) 1 and 2.</p>		
66.B.120(c)(2)	IWW, The Netherlands	099	<p>Since there is no reverence to an approved procedure with a Part M AMO as with an Part 145 AMO as stated in 66.B120(a), CAA-NL suggests to remove the Part M AMO here. The NAA will not standard be informed at witch Part M AMO the licence holder is working.</p>		Agreed. Text changed, although not exactly as proposed.
66.B.125(b)	CAA, UK	118	<p>(b) Does not differentiate between an examiner who sets the questions and an invigilator who supervises the conduct of the written examination.</p> <p><i>Suggested text:</i></p> <p>Substitute 'invigilator(s)' for 'examiners' and add 'written' before 'examinations'.</p>		Examiner is the original term from A&GM Chapter 23 and is the same term as in Part-147. No text change.
66.B.125(e)	DGAC, France	162	<p>(e) New essay questions shall be raised at least every six months, except if no examination has been undertaken within the period, and the oldest questions withdrawn or rested from use. A record of the questions used shall be retained in the records for reference.</p>	Implementation problem: It is useless to raise new essay questions if the last set of essay questions has not been used yet.	Agreed. Text changed.
66.B.130 (See also Explanatory Note 1.3 and 66.A.70)	CAA, Denmark	121	<p>Part 66.B130(a) <i>only conversion in accordance with a conversion report.</i> Review Board report prepared under JAA system seems not to be accepted under part 66.B.130(a). New Report to be prepared for each applicant. Clarification: Explanatory Note to Annex II (part 66) add. 1.3 transitional measures suggest 2 years for adoption. If all training must be reviewed on an individual basis as given in 66.A.70 and 66.B.130 the adoption time suggested,</p>		66.B.135 and .140 clarify the content of the report as being a generic, not an individual report.  Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			2 years, is to short.  In general a more detailed guidance program needed for the adoption period.		
66.B.135	RAES, UK	107	In the interest of clarity we would insert the phrase "without limitation" immediately after, ....and the Part-66 module/subjects on which examination is needed to ensure conversion to the aircraft maintenance licence...."		Agreed. Text changed.
66.B.140	CAA, UK	118	This should also include reference to aircraft type authorisations. The text should be simplified to improve readability.  <b>Suggested text:</b> The report shall describe the scope of each authorisation and aircraft type authorisation, and reflect the relevant Part 66 aircraft maintenance licence category, including limitation on which examination is needed to convert the licence. The report shall include a copy of the relevant approval maintenance organisations procedures for the qualification of certifying staff, on which the conversion process is based.		Suggested text changes the meaning. Text not changed.
66.B.150	Assn. of Licensed Aircraft Engineers	010	This is a question on examination credits:- Credits are given by some competent Authorities and not by others. What is the position if a member state via it's competent authority decides it does not like some of the credits agreed to by another member state. Can the member state disallow such engineers working in their state, or will it be if the agency agrees such credits the member states will have to employ such engineers with a basic knowledge that the employing member state is not happy with?		This comment has no effect on the regulation.
66.B.155	CAA, UK	118	Add new conditions to reflect medical conditions as specified in 66.A.50.  <b>Suggested text:</b> 9. Issuing a Certificate of Release to Service when medically unfit.		The case of a person issuing certificates while medically unfit is already covered by paragraph 8. Text not changed.
66.B.155	DGAC, France	162	This paragraph is not mature	Impracticable:  Usually, the licence is considered like a diploma and is not suspended or limited. The authority limits or suspend instead the privileges associated to the licence. Limitation, suspension or revocation of a licence would necessitate the definition of conditions to get the licence back.	66.B.155 is based upon the original text from JAR 66. The licence is not just a diploma as it confers privileges. Within the Part-M context, suspending the licence is the only way to suspend the related privileges. Finally 66.B.155 defines the

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				<p>Suspension are subject to national legal and administrative procedure, and this regulation can not require suspension.</p> <p>Such requirement can only be drafted with very serious caution as they have a major impact on the ability of mechanics to work</p>	<p>criteria for suspending or revoking a licence but does not address the procedure for such action, which is indeed covered by National laws, therefore proposed text creates no conflict with national legal and administrative procedures. Text not changed.</p>
66.B.155	CFDT, France	144	It must be written in the IR that the person can present his/her defence, the procedure being into the AMC		<p>The appeal procedure is a National procedure. Text not changed.</p>
Appendix 1	CAA, UK	118	<p>A revision of the current Appendix 1 is necessary to reflect new practices and technologies and redraft the text to meet proper academic standards for syllabi structure. A working group should be convened to draft a new appendix 1 based upon academic principles.</p>		<p>Comment noted. No such action can be taken at this stage of the consultation..</p>
Appendix 1	CAA, UK	118	<p>Modularisation. Table of modules to licence categories/sub categories is incorrect in that some of the modules listed are not applicable to category A. Does not show separation of module 11.</p> <p><i>Suggested text:</i> Change table to show a column for each category/subcategory. Show module 11a &amp; 11b.</p>		<p>The table is a summary. Detailed information on module applicability is contained in the main text. Text not changed.</p>
Appendix 1	RAES, UK	107	We believe that an additional requirement should be added to ensure that Category C Licence holders should cover (at least) Modules 9 and 10, as these may not have been covered sufficiently in the syllabus of a technical degree.		<p>First paragraph of Appendix 1 states that Cat C must meet the knowledge levels of either B1 or B2. Text not changed.</p>
Appendix 1	Lufthansa Technik	021	By incorporating "light aircraft" and "helicopter" – personnel some modules have been beefed up for the complete community. As a result certifying staff for commercial air transport now finds wooden structures, fabric covering and wooden propeller in his syllabus.		<p>The Part-66 licence is indeed a basic licence intended to cover all applicable technologies. Text not changed.</p>
Appendix 1	EAMTC working group	026	The introduction of new sub-modules in the basic exam. Syllabus must not lead to a conversion training for all individuals who have already passed CAT A training or conversion training for CAT B1 or B2.		<p>Article 5 of the draft Commission Regulation on continuing airworthiness states existing JAR 66 licences remain valid. No conversion training is therefore needed for JAR 66 licences without a limitation.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
					Text not changed.
Appendix 1	LBA	055	The former Module 18 for "airships with aerodynamic lift" shall be added. This type of aircraft is part of Part 66 Subpart A licences.		Module 18 never existed. Airships are not covered by Part-66. Text not changed.
Appendix 1	CAA, Norway	131	The item (2) Modularization is not up-dated as for M11b) etc.		The table is a summary. Detailed information on module applicability is contained in the main text. Text not changed.
Appendix 1	CAA, Norway	131	Module 13 should be amended to contain the same elements as in Appendix 3 (Type training & examination standard) (2) Type training standard B2. Reason: To harmonise subject elements i.e. fuel, hydraulics, fire etc.		Comment too general. Proposed text change is missing. Text not changed.
Appendix 1	DGAC, France	162	I – The proposed programme is too demanding for light aircraft (notably A2, B.1.2, A4 and B1.4) II – Amend chapter 2 – Modularisation and Module 16- Piston Engine as follows.	I - Impracticable: The level of knowledge required is not commensurate to the elementary nature of light aircraft (compared to what is required for much more complex large aircraft). There is no justification for such a level of knowledge. A too high level of qualification for light aircraft mechanics will create either frustrations amongst overqualified personnel of small general aviation maintenance organisations or a lack of personnel as these qualified people will go to better paying 145 organisations. Such a decision can not be taken without a serious regulatory impact assessment. For information, you will find appended the programme of our national aircraft systems vocational training certificate which, in our opinion, would be a better basis with appropriate intensification where necessary. See also comment to Part 147, Appendix 1. II - Editorial Module 11a and 11b are based upon former Module 11. The matrix must follow the syllabus. Module 16 is Piston engine and consequently applicable to A2 and B1.2.	The Appendix 1 basic knowledge requirement levels are intended to facilitate the possibility for an AML holder to obtain group ratings. Text not changed.
Appendix 1	CAA, Ireland	154	Annex 1 shows some changes in addition to those affecting non-complex aircraft. At the top ten meeting it was agreed that the appendix 1 syllabus is not detailed enough to show clearly what is		Proposed changes do not preclude subsequent changes. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			required. It is proposed that no changes be made to the present syllabus until the complete syllabus is revised as envisaged by the top ten meeting.		
Appendix 1	Lufthansa Technik AG	148	The introduction of new sub-modules in the basic exam. Syllabus must not lead to a conversion training for all individuals who have already passed CAT A training or conversion training for CAT B1 or B2.		Article 5 of the draft Commission Regulation on continuing airworthiness etc., states existing JAR 66 licences remain valid. No conversion training is therefore needed for JAR 66 licences without a limitation. Text not changed.
Appendix 1	Lufthansa Technik AG	148	By incorporating "light aircraft" and "helicopter" – personnel some modules have been beefed up for the complete community. As a result certifying staff for commercial air transport now finds wooden structures, fabric covering and wooden propeller in his syllabus.		The Part-66 licence is indeed a basic licence intended to cover all applicable technologies. Text not changed.
Appendix 1	ENA, Italy	102	MODULARISATION table has not been modified to accept the 11a and 11b modules introduced to account for the difference with JAR 66.		The table is a summary. Detailed information on module applicability is contained in the main text. Text not changed.
Appendix 1	ALAE	036	With reference to the syllabus on basic knowledge it seems to be perfectly acceptable as regards basic knowledge and the required levels for the various Licences seems adequate to produce a good, finished result. However do we want the holders of such basic knowledge as genuine hands on trouble shooters and all round Engineers. I personally still want a lot of convincing that a good B1 all rounder needs algebra. I speak as an Engineer of 40 years standing, working with a Licence. I certainly never used algebra. However this basic knowledge document does prove that in the majority of cases a good educational standard is required. One can only hope that EASA will take on board that all member states must ensure that such teaching of a technical nature is available to young students whilst in the national curriculum and such teaching must be agreed by the National Competent Authority.		Module 1 (Mathematics) of Appendix 1 is based upon existing JAR 66 text. No objective justification for changing existing text is given. No change.
Appendix 1	Mr Cartry	048	We place this comment in the case of light aircraft, under 2 tons. The basic knowledge requirements a person needs for the issue of a category B1.2 aircraft maintenance licence are very high.	A lot of the knowledge is out of the subject for light aircrafts. To obtain this level is not necessary to issue a certificate of release to service. If the mechanic works on light aircraft, he will never use a large part of the required knowledge. A mechanic who obtains this level of knowledge will never work in an aero-club, but in a company.	The basic knowledge requirement are set at high level to facilitate the possibility for an AML holder to obtain group ratings. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
				The knowledge of most part of aero-club mechanics is very far from the proposed requirements.	
Appendix 1, 6.1 a)	ERA	079	Replace the phrase “alloys steels” with “alloy steels”.		Agreed. Text changed.
Appendix 1, 7.8	ERA	079	The word riveting is misspelled in the second and third lines.		Agreed. Text changed.
Appendix 1, 13.4	ERA	079	The phrase “tance Measuring Equipment (DME)” should be replaced with “Distance Measuring Equipment (DME)”		Agreed. Text changed.
Appendix 1, 1 1	ERA	079	Replace the phrase “knowledge levels indicators” with “knowledge level indicators”.		Agreed. Text changed.
Appendix 1, paragraph 2	CAA, Ireland	154	The matrix shows module 4 as applicable to Category A. The syllabus shows that module 4 is not applicable to Category A. It is proposed to amend the matrix to show that module 4 is not applicable to Category A.		The table is a summary. Detailed information on module applicability is contained in the main text. Text not changed.
Appendix 2	CAA, UK	118	Credits given against certain modules of appendix 1 should have the same validity as that applied to examination passes.  <i>Suggested text:</i>  <i>1.11 All part 66 modules and any credits awarded in accordance with 66.B.150, that make up a complete Part 66 aircraft maintenance licence category/subcategory must be passed within a 5 year time period of passing the first module, except in the case specified in paragraph 1.12.</i>  <i>1.12 The 5 year time period specified in paragraph 1.11 does not apply to those modules which are common to more than one part 66 aircraft maintenance licence category or subcategory and which were previously passed as part of another such category or subcategory now held on a licence.</i>		This is a new requirement that cannot be included without proper consultation. Text not changed.
Appendix 2	CAA, Denmark	121	JAA Question bank not mentioned. Clarification needed for access to question bank.		The possible development of a central examination databank is not relevant to the present consultation.
Appendix 2, 3 and 4	LBA	055	In these appendices “airships with aerodynamic lift” shall be added (see comment to Appendix 1). This type of aircraft is part of Part 66 Subpart A licences.		Airships are not covered by Part-66. Text not changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
Appendix 3	CAA, UK	118	Amend table to reduce complexity. Show only one Category C column as levels are the same in all cases.		Cat C levels are not the same in all cases (e.g. turbine aeroplane vs. piston helicopter). Text not changed.
Appendix 3 (2) Type Training Standard	Wideroe, Norway	028	ATA 26, Fire Protection should be Level 3 for B2 as this is an electronic system. ATA 28, Fuel should be Level 2 for B2 as a large portion of it is Electrical/Electronic. In the portion of Turbine Engine the FADEC Level 3 is not logical without a certain knowledge level of the rest of the engine. In the Propeller section I miss Propeller Electronic control (PEC) The different ATA'S and level for B2 needs a careful review.		(a) Fire protection is a B1 task.  (b) Fuel systems for B2 changed to level 2.  (c) PEC added.
Appendix 3	CAA, Denmark	121	ATA 104 used as a reference, own EU standard should be developed. An adoption from ATA 104 used in Appendix for type training. Guidance to Part 66 still refers to ATA 104 levels.		Comment noted. No action required.
Appendix 3	CAA, Denmark	121	Practical training element must reflect the task as given in Maintenance Manual and other relevant manuals. It should be a clear guidance for what is needed on the practical side as this training is a training standard for the certifying staff knowledge and a standard for type rating in the license. Type training has become a theoretical course with little weight on the minimum practical training needed. This training should at least reflect the task given in the Maintenance Manual why the word in 2.2(a) if required is to open. The examination standard given in (3) for type training examination must include an acceptance of the quality of the practical training by an assessment performed by dedicated persons from Part 147, Part 145 or Competent authority. Clarification needed for, that practical type training must reflect the tasks given in the Maintenance Manual and this covers functional test of engines and systems as well. The practical training must be examined by an assessment, ensure safe certification given in part 66 Appendix 3, (2.2) not specific enough. A certificate of recognition must reflect if full training is not given, as an example if functional test not part of the training. This could lead to a lower level and flight safety could be affected. (different culture for type training to day not exposed in certificate of recognition). An addition to the relevant categories could solve the problem. This addition could cover specialist training as: Engine run, NDT based on EN standard, boroscope		Comment noted, but no clear proposal made. No text change.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			inspections, taxi, compass swing etc.		
Appendix 3	CAA, Finland	157	There should be guidelines in the appendix III, that help to define the duration of practical training (OJT), that is needed after completion of type training course before the type rating can be granted. Guidelines inserted only in the AMC are not legally binding.		This is covered by the AMC.
Appendix 3	DGAC, France	162	I – Reference to usual ATA references would be very useful II – Type training at T2 level for category B2 personnel should be at level 1 as for training at T4 level for category C personnel III – Paragraph (1) of chapter (3) – Type training examination standard – should be modified as follows: “(1) Format of the examination is of the multiple-choice type. Each multiple choice question must have 3 alternative answers of which only one must be the correct answer. The time for answering is based upon a nominal average of 90 seconds per question.”	I - Editorial: ATA references which are commonly used will help better understand certifying staff qualifications and associated privileges. II - Implementation problem: The first type training for category C shall be a type training T1 or T2. Level of T1 / T2 type training is higher than T4 type training level. As a B2 licence holder can access to a C licence, it's necessary for B2 candidate to cover all subject at least at level 1. III – Implementation problem: The average of 90 seconds is more appropriate for type training examination rather than 75 seconds for level 1 and 2, and 120 seconds for level 3 because ATA 104 level defines the objectives and not the difficulties level.	I - ATA references are not used on all aircraft types. II - B2 training is for the B2 needs and not for the future C needs. III - Text is based upon existing JAA material (TGL 40), itself established on the basis of European maintenance training organisations experience.  Text not changed.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Intermission (3) statement: „...minimum of 4 question per syllabus subject.“ Delete this part of the sentence.	This requirement drives the total amount of questions necessary to ridiculous levels. Example: For a Cat C a Level 1 course is required (average duration 5 days). Questions 4 x 51 subjects = 204 questions for a Level 1 course. 75 seconds per question makes 15300 sec which are 255 minutes or 4.25 hours. Under the line it will take a whole day of testing for a 5 or less day course.	4 questions changed to 2 questions.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Training syllabus matrix A grouping of subject titles must be possible (same way as introduction module). Proposal for subject groups beside the intro-module: · module structure · module airframe/avionics · module turbine engine · module piston engine  · module propeller/rotor · module additional engine systems	Decreasing number of questions. EAMTC Working Group has evaluated that approximately one question per instruction hour reflects the present European industry standard. There is no need for a change. In respect to that it must be possible to “group” certain subjects.	Number of questions reduced (see above).

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			<p>Example: Above the turbine engine subjects are 21 x 4 questions minimum = 84 questions (2.8 hours in a level 3 course)</p> <p>Turbine engine subjects grouped: Round about 25 hours instruction = 25 questions for the whole engine ( 50 min. for level 3 and 30 min. for level 1).</p>		
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Training syllabus matrix: Certain training objectives are missing. For example rotors for B1.3 and B1.4 are missing		Rotors are included. Text not changed.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Training syllabus matrix. All subjects in the matrix are from basic training, but this text is dealing with type training. The intention to standardise independent from American specifications (here: ATA 104) is understood but highly counterproductive for the global acting aviation community. All documents used in manufacturing, operation, maintenance and overhaul as well as Training (!) are structured according to this specification. In the light of modern – to a high degree very complex – aircraft systems, which also refer to this specification, the selected approach may jeopardize safety! We must stay with the ATA-chapters for training (and other) purposes		The table includes type training, not basic training subjects. The table would be too complex with all ATA references. Text not changed.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	<p>Training syllabus matrix</p> <p>Appearance of new systems or ATA-chapters such as</p> <ul style="list-style-type: none"> <li>· Cabin Systems ATA 44</li> <li>· Information Systems ATA 46</li> <li>· Cargo and Accessory Compartments ATA 50</li> </ul> <p>These ATA-chapters must also be part of the matrix.</p>	For future aircraft they will reflect the aircraft breakdown and in respect to that have to be taken into account for training needs, training manuals and tests.	Text changed to open to possibility to address new technologies.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Training syllabus matrix. Engine condition monitoring should be addressed in the intro-module only. Monitoring is not performed by maintenance personnel (certifying staff) but by engineering staff!		Certifying staff do perform engine monitoring (e.g. during ground run). Engineering staff perform engine <i>trend</i> monitoring. Text not changed.
Appendix 3 (3) Type Training Examination Standard	EAMTC working group	026	Training syllabus matrix. Engine run up should not form part of a B1 course. Run up is always specialized training (level 4) followed by a special authorization		Engine run up not in. No change required.
Appendix 3 (3) Type Training Examination Standard	Lufthansa Technik Germany	037	Training syllabus matrix: Certain training objectives are missing For example rotors for B1.3 and B1.4 are missing		Rotors are included. Text not changed.
Appendix 3 (3) Type training	Airbus MTO	015	(1) Format of the examination is of the multiple-choice type. Each multiple choice question must have <b>3 alternative</b>	As long as there is not a common data-base for type training examination the idea of	Existing JAR 66 requirement. Text not changed.

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examination standards			<b>answers</b> of which only one must be the correct answer. The time for answering is based upon a nominal average of 120 seconds per level 3 question and 75 seconds per level 1 or 2 question. To Add <b>minimum</b> before <b>3 alternative answers</b>	minimum should be acceptable.	
Appendix 3 (3) Type training examination standards	Airbus MTO	015	(3) The number of questions must be at least 1 question per hour of instruction subject to a minimum of 4 questions per Syllabus <b>subject</b> . The competent authority of the Member State will assess number and level of questions on a sampling basis when approving the course.  To replace <b>subject</b> : to <b>module</b> (one module can be one ATA or a group of ATA Ex: structure)		Number of questions reduced to 2 per subject.
Appendix 3 §2 (Type training standard)	P. Nocaudie, Flight Safety	005	In the Turbine Engine list, "Engine Controls" ( ATA chapter 76) is not listed.		Engine controls added.
Appendix 3 para 1	Airbus MTO	015	(1) Type training levels. Course objectives: Upon completion of the course, the student will be able to identify safety precautions related to the airframe, its systems and powerplant  Change the format to: Course objectives: Upon completion of the course, the student will be able to : 1) identify safety precautions related to the airframe, its systems and powerplant 2).....	To take into account the "difference training"	Agreed. Text changed.
Appendix 3, (2) Type training standard, (2-1) Theoretical element	Airbus MTO	015	Change the existing table to the following table (See Attachment #1 Airbus)	To deal with ATA chapters and to regroup some subjects.	Proposed table is incomplete and therefore cannot be used. It does not cover all aircraft. Text not changed.
Appendix 4	CAA, UK	118	Third paragraph – editorial error "50% of the applicant has".  <i>Suggested text:</i> <i>"50% for an applicant that has completed."</i>		Agreed. Text changed.
Appendix 4 Experience requirements	Wideroe, Norway	028	The experience requirement will be reduced by 50% if the applicant has completed.....(Typing error?)		Agreed. Text changed.
Appendix 4 Title on page 59/70	ERA	079	The first line of this title uses the phrase "An Part 66 Aircraft Maintenance Licence". This should be amended to read "A Part 66 Aircraft Maintenance Licence".		Agreed. Text changed.
Appendix 4 Third sentence on	ERA	079	The phrase "reduced by 50% of the applicant" should be replaced with "reduced by 50% if the applicant".		Agreed. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
page 59/70					
Appendix 4	Air France	086	As defined in the JAR 66 the additional experience requirement for extending a B1.1 subcategory to an existing B2 category Part 66 licence is the same as for extending a B2 category to an existing B1.1 subcategory : in both situations the requirement is 1 year	Note in line with JAR 66	Agreed. Text changed
Appendix 4	CAA, UK	118	The experience requirements are inconsistent. For licence issue, 66.30 (d) requires only 1 years recent experience on aircraft of the category/sub-category for which the licence is sought. However Appendix 4 in some cases requires a greater period of experience on aircraft of the category/sub-category to extend a licence than that required for licence issue. Eg, B2 to B1.1 or B1.3 requires 2 years experience. <i>Suggested text:</i> Amend Appendix 4 to reflect requirements of 66.A.30.		Agreed. Text changed.
Appendix 4	DGAC, France	162	B1.3→B2: minimum experience should be 1 year, as it is the case for B1.1 to B2. B1.1→A2 : minimum experience should be 6 months, as it is the case for B1.3 to A4 B1.2→B1.1:minimum experience should be 6 months, as it is the case from B1.1→B1.2 B1.3→B1.1 : minimum experience should be reduced to 1 year B1.3→B1.2 :minimum experience should be 2 years, as it is the case for B1.2 to B1.3 B1.4→B1.2: minimum experience should be 1 year B1.1→B1.3: minimum experience should be reduced to 1 year B1.4→B1.3: minimum experience should be 6 months, as it is the case from B1.3 to B1.4 B1.1→B1.4: minimum experience should be 2 years, as it is the case from B1.4 to B1.1 B1.2→B1.4: minimum experience should be 1 year B2→B1.2 : minimum experience should be 2 years as it is the case from B2 to B1.1 B2→B1.4: minimum experience should be 2 years as it is the case from B2 to B1.3		Part of the suggestions agreed. Some of the text changed.
Appendix 5	CAA, UK	118	Example licence. Suggest new " <i>condition</i> " to reflect 66.A.20 (b) 2.  <i>Suggested text:</i> 6. The privileges of this licence may not be exercised unless in the preceding two year period the holder has had either 6 months of maintenance experience in accordance with the privileges granted by the licence, or met the provision for the issue of the appropriate		Agreed. Text changed.

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p>privileges.</p> <p>Comment: Text relating to the licence format is split between 2 pages, separated by the example application form and some information is duplicated.</p> <p>Suggested text: Put text together.</p> <p>Comment: Licence format makes fraudulent entry easy where the ratings are pre-printed. Suggested text: Add 'Where a pre-printed licence format is used, any Category, sub-category or type rating box which does not contain a rating entry shall be marked to show that the rating is not held.'</p> <p>The licence layout is designed for manual production and does not lend itself to computer generation. There should be more flexibility in arranging the entries where the licence pages are computer generated. The format does not allow technical limitations against individual categories or type ratings to be shown clearly. suggested text:</p> <p>Delete sentence starting 'Not withstanding this..'</p> <p>Delete from 2. 'must be printed in the standardised form shown but'</p> <p>Alternatively, delete the specimen format and text in Appendix 5 and specify that the licence format must follow the ICAO Annex 1 specification.</p> <p>Numbering of items on the licence document does not follow the standard required in ICAO Annex 1 (Chapter 5 Specification for Personnel Licences).</p> <p>Suggested text:</p> <p>1.2 Change numbering as follows:</p> <p>1.3 III Licence number IV Name of Holder IV a Date of Birth</p>		<p>Text changed</p> <p>Text changed</p> <p>The licence format proved compatible with computer generation. Text not changed.</p> <p>The format follows the existing JAR 66 format. ICAO Annex 1 format is not a requirement. Part-66 licence content is in compliance with ICAO Annex 1. Text not changed.</p>

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Paragraph	Organisation	RD Ref.	Proposed text / Comment	Reason	Response
			<p>X Signature of Issuing Officer                      XI Seal or Stamp of issuing authority</p> <p>Change all other numbers to Roman numerals</p> <p>Add XII before (Sub) Categories &amp; before Type Ratings                      Add IX before Conditions                      Add XIII before Limitations</p>		
Appendix 5	LBA	055	<p>1. change "variation/continuity" in the headlines on both pages to "amendment/renewal"                      This wording is used in the Part 66 Section A and B.</p> <p>2. change "Part-145 Approval" to "Part 145/Part M Approval"                      Organisations which are approved in accordance with Part M employ Part 66 personnel, too.</p> <p>3. change "Part-145 AMO" to "Part 145 AMO / Part M AMO"                      Organisations which are approved in accordance with Part M employ Part 66 personnel, too.</p>		<p>1. Agreed.                      Text changed.</p> <p>2. Agreed.                      Text changed.</p> <p>3. Agreed.                      Text changed.</p>
Appendix 5, EASA Form 19	ERA	079	The third block entitled "AML Details" appears to have some text to the left of the block that does not fit. Is this an error and is there any missing text that should be included?		Agreed. Format changed.
Appendix 5, EASA Form 19	ERA	079	The bottom signature block, paragraph 3 needs the " deleting from the end of the sentence. Additionally the very last sentence uses the phrase "an Part 66 AML". This should be amended to read "A Part 66 AML".		Agreed. Text changed.
Appendix 5, Part-66 AML	ERA	079	Paragraph 4 of the Condition block needs the word "of" inserting between the words "requirements" and "Part M".		Agreed. Text changed.