

**Comment Response Document (CRD)
to Notice of Proposed Amendment (NPA) 2007-04**

for amending Decision No 2003/19/RM of the Executive Director of the Agency of 28 November 2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks

Re-issuance of the Part-66 Aircraft Maintenance Licence

Explanatory Note

I. General

1. The purpose of the Notice of Proposed Amendment (NPA) 2007-04 dated 30 April 2007, was to propose an amendment to Decision 2003/19/RM of the Executive Director of the European Aviation Safety Agency of 28 November 2003 on acceptable means of compliance and guidance material to Commission Regulation (EC) No 2042/2003 of 20 November 2003 on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisations and personnel involved in these tasks.

II. Consultation

2. The draft Executive Director Decision amending Decision N° 2003/19/RM was published on the web site (<http://www.easa.europa.eu>) on 30 April 2007.

By the closing date of 3 August 2007, the European Aviation Safety Agency ("the Agency") had received 83 comments from 42 National Aviation Authorities, professional organisations and private companies.

III. Publication of the CRD

3. All comments received have been acknowledged and incorporated into this Comment Response Document (CRD) with the responses of the Agency.
4. In responding to comments, a standard terminology has been applied to attest the Agency's acceptance of the comment. This terminology is as follows:
 - **Accepted** – The comment is agreed by the Agency and any proposed amendment is wholly transferred to the revised text.
 - **Partially Accepted** – Either the comment is only agreed in part by the Agency, or the comment is agreed by the Agency but any proposed amendment is partially transferred to the revised text.
 - **Noted** – The comment is acknowledged by the Agency but no change to the existing text is considered necessary.
 - **Not Accepted** - The comment or proposed amendment is not shared by the Agency

The resulting text highlights the changes as compared to the current rule.

5. The final draft of Agency's Decision after reviewing the comments has been attached to this CRD to allow for any possible reactions of stakeholders regarding possible misunderstandings of the comments received and answers provided.
6. Such reactions should be received by the Agency not later than 2 December 2007 and should be submitted using the Comment-Response Tool at <http://hub.easa.europa.eu/crt>.

IV. CRD table of comments, responses and resulting text

(General Comments)	-
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comment

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comment by: *John Morgan*

I'm afraid I felt I must write to you about the NPA above regarding renewal of the JAR66 Licence.
 I have been concerned now for a while about, what I consider to be, the degradation of my ex UK CAA BCAR licence to the EASA Part 66 format. Now with this NPA I am incensed with the requirements for renewal.
 I have worked as an LAE, then Shift Supervisor with responsibility for 20 LAE's, moved in to Quality as the Deputy Quality Manager and I am now the CAME Manager for Astraeus Ltd.
 With this new proposal I will not be able to renew my licence as I would not meet the 80% hands on role. May I point out that the licence is only a pre-requisite to allow me to work on aircraft; I must have company approvals to do so with all the control that goes with that.
 With my previous UK licence, allowance was made for personnel such as myself who worked in a managerial role, where control and assessment of Airworthiness Directives/Service Bulletins and day to day troubleshooting of the aircraft was part of the daily work. I am also responsible for backing up the LAE with any problems that are outside of the manufacturer's manuals and liaising with the NAA on all aspects aircraft maintenance.
 Will JAR66 holders who work in the NAA's as surveyors have their revoked, I think not.
 I shall be writing to all involved in A/c maintenance to canvas support against this NPA.

response

Partially accepted

This NPA does not modify the conditions for the renewal of the licence stated in the paragraph 66.B.120 "Procedure for the renewal of an aircraft maintenance licence". Any personnel holding a Part-66 licence who do not meet the 6 months experience will not lose his licence nor the type ratings at renewal for the reason that he is not meeting this requirement. The removal of a licence can be made only when not meeting the conditions in 66.B.500, as i.e. certifying the release of an aircraft when one of the requirements of Part-66 is not met. The NPA concerns only how you may keep the right of exercising the privileges of certifying staff. This is explained in GM 66.A.40. If the conditions of experience are no more met, only the continued validity of the privilege is affected, not the licence nor the type ratings, and in such case the license holder shall not release an aircraft. Obtaining back this privilege may be regained by demonstration of such experience. The paragraph AMC 66.B.500 has been deleted. Therefore this rule and the NPA should not prevent engineers in technical and management roles keeping their licences and the endorsed type ratings.

comment

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comment by: *phil Rushton*

CAA AML/410487L
 As a Licensed Engineer in a managerial role I strongly object to this amendment. The progression from hands on engineer to technical and management roles in aviation still requires the same in depth knowledge of all

aspects covered by the AMEL. The industry in general is suffering from a lack of licensed engineers and by amending the experience requirement, you are in the longer term revoking all licenses held outside the shop floor environment. This will add further barriers to any engineer considering moving into a managerial or technical support role. Taking this one step further these roles will have to be filled from resources outside the AMEL group, thus reducing the knowledge and qualification base in the office and support functions. I am not saying that all support functions need to be carried out by AMEL holders; I am saying that we need to maintain a healthy ratio of these qualified and experienced personnel across the entire aircraft maintenance industry. Taking the fact that the basic AMEL does not carry any certification rights without the support of a company approval anyway; what will be gained by removing the primary professional qualification from a large portion of the aircraft engineering population? Noting that the aircraft inspection and certification portion of the Airworthiness Review Certificate's (ARC), AD's SB's etc, must be carried out by a type approval holder, I would suggest that the majority of the supporting research and preparation will also be carried out by a high percentage of AMEL holders. In fact, the hands-on function of aircraft maintenance is only the tip of the iceberg and we must not restrict the movement of engineers who continue to enhance safety by developing the knowledge base behind the scenes.

response *Partially accepted*

See answer to comment No.2 from John Morgan

comment

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comment by: *Mike Ainsworth*

Please be advised that I object to the idea of withdrawing my provelges as a Licenced Engineer just because I chose the managememt route. My job is that of a Maintenance Manager with direct responsibility for the servicaeability of 23 medium/large transport aircraft. just because I do not work directly on aircraft does not mean that I am not involved with systems/trouble shooting/maintenace and other support matters on a daily basis. After 34 years as an Aircraft Engineer,unless I retain my proveleges as a Licenced Engineer, I will give serious considration to resigning from my position as a Maintenance Manager and returning to the shop floor. There are many positions for Licenced Engineers, there are few for Maintenance Managers. If for any reason I was to lose my job and be unable to get another one as a Maintenance Manager, I would then be looking for a job as a Licenced Engineer. With what you are proposing, I would not be able to do that and would therefore have to leave the industry and seek another career. I do hope that EASA reconsiders theri NPA

response *Partially accepted*

See answer to comment No.2 from John Morgan

comment

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comment by: *TYROLEAN AIRWAYS*

It appears that this proposed amendment completely misses the initial target to get more control/oversight for NAA's over the maintenance experience of their licence holders for the following reason:
The only group of licence holders who has no maintenance experience record

required by present regulation are the independent licence holders (GA) and exactly that group is exempted from this NPA!!

Even more it is not understandable that for Certifying staff in a Pt-145 and Pt-M Subpart F organisation - where there are detailed maintenance experience requirements in Pt-145.A.35 (c) and M.A. 607 (a) defined - additional requirements should be implemented in Pt-66?? - pls provide substantiating figures of the (proposed) increased safety against the increased administrative burden and cost.

As well, the "awareness of certifying staff for their privileges" is not raised at all when the requirement for experience documentation is put on the approved maintenance organisation (and not on the individual itself) as in this NPA!

Therefore we recommend to reject this NPA (or at least start again with a new approach which incorporates a sound safety and benefit analysis comparing present and anticipated safety levels and removing the continued duplication and inconsistencies between Pt-66, Pt-145 and Pt-M requirements).

Only in the latter case consider my further comments

response

Not accepted

Independent licence holders are also affected by this NPA. Indeed the paragraph "Outside approved organisations" is affecting this category of independent certifying staff.

The requirement in 66.A.20 is not to be understood as additional requirement to 145.A.30(c) and M.A.607(a), however the Agency understands the commenter's concerns and several rulemaking tasks are taking place to remove the requirements in 145.A.35(c) and M.A.607(a) to place them in a single 66.A.20(b) paragraph. This will simplify the rule.

There is not any modification of the rule for recording the experience, as AMC 66.A.20(b) already recommends that "experience should be supported by documentary evidence". The AMC suggests ways for recording and documenting experience, which is applicable to both engineers in organisations and those outside of organisations.

comment

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comment by: FAA

The FAA has reviewed the subject NPA and has no comments.

response

Noted

Noted

comment

58

comment by: Bristow (European Operations)

NPA2007-04 relating to the issue and re issue of Part 66 Engineers Maintenance Licenses appears to severely restrict the employability of the licensed engineer. If the renewal requires engineers to have worked on all aircraft Types during the preceding period or lose their Type Rating on any Type not worked on it will not allow the Engineer to move to other companies apart from those operating the aircraft on his License. Further more Licensed Engineers in Management roles will not be in a position to meet these requirements but will still be heavily involved in the Aircraft maintenance activity. Both these scenarios will penalise the Engineer where the company should be responsible for revalidating the individuals approval should he be

required to work on a Type where his experience is not deemed to be current. For further EASA validation to take place via a Part 147 organisation and 6 Months subsequent experience any Engineer finding himself in this position will be severely disadvantaged in the employment market.

response *Not accepted*

This AMC does not propose conditions for the renewal of a licence therefore not meeting the condition set in 66.A.20(b) is not a condition for removing the licence or any type rating. Refer to answer made to comment n° 21 to Tyrolean Airways. It does not require also the licence holder to work on all types of aircraft, but it proposes as an acceptable means to comply with the rule to work only on one aircraft type of "same technology, construction and systems" groups. The purpose is to ensure the continuing validity of the privilege of the licence. A licence and a type rating endorsed on a licence remain valid if there has not been any reason to revoke, suspend or limit a licence for the reasons mentioned in 66.B500. Management personnel holding a valid licence will continue holding this licence, and not meeting the conditions in 66.A.20(b) removes only the privileges of certifying aircraft. Airworthiness review staff meeting the criteria in M.A.707(a) may continue exercising their privileges too, as AMC 707(a)3 authorise this personnel not satisfying the experience requirements at the time of review.

comment 59

comment by: *FlyerTech Ltd*

I currently work as a manager for an independent EASA Part M Subpart G company in the UK. My roles are varied, but do include aircraft audit and inspections as well as project management to include oversight of aircraft transitions between EU and non-EU Countries. I currently hold a Restricted Part 66 licence without any type ratings.

The EASA NPA 2007-04 will not impact me directly as currently I hold no privileges. However, I am concerned that given the company for which I work has there are no opportunities for me to obtain the practical experience required to renew my colleagues type ratings on their licences. I feel very strongly that EASA has this so very wrong.

Under NPA 2007-04 only a 20% weighting will be applied to personnel working in Continued Airworthiness Management. Surely, the point has been missed for what the licence stands for. A licensed engineer has always been depicted as someone who can apply and understand legislation as well as having good aircraft knowledge. Arguably, someone working in the Continued Airworthiness Department has access to both. Generally, they assist from the office in trouble shooting, damage assessment and control and apply legislation in a practical sense by creating engineering orders or similar to ensure safety and legislative requirements are met.

Another point is that in the UK the Aircraft Engineers Licence is seen as a similar qualification to holding a university degree. The addition of type ratings opens doors and provides employers a confidence in a skill level. To simply remove the ability to hold a type rated licence would be similar to non-recognition of a University Degree/Diploma. The industry believes that the type rated licence shows a level of competence and that all licensed engineers know that a company approval or type rating is required before you can set to work on any aircraft. As a matter of fact in my company, procedures dictate that no-one touches an aircraft without the operators engineers say so.

My concern is that should it be understood that aircraft licence privileges will not be renewed for technical services staff then it will have a detrimental effect on the skill and experience employed in this field. My experience is that it is difficult enough obtaining the staff now and with this extra concern engineers may be forced to stay as certification staff and never being able to diversify.

Therefore, I would wish to see clarity in the amendment should it be enforced to assure personnel similar to myself in a Continued Airworthiness Field that we will be able to renew our type ratings, given that we will have no aircraft certification privileges. It should be considered that a new category of the licence is awarded to engineering office based staff to ensure that Continued Airworthiness Staff are retained and attracted into a highly skilled and specialised field that hold as much responsibility as the engineer releasing an aircraft .

Martin Bell
Operations Director
FlyerTech Ltd

response *Not accepted*

The case described in this comment is not affected by the NPA, because originally this basic licence described has no privilege. Therefore the conditions for continued validity of privileges do not apply. The competent authority has no reason to revoke, suspend or limit this licence if the conditions mentioned in 66.B.500 are all met. In the same way, a type rating endorsed on a licence remains valid even if the conditions in 66.A.20(b) are not met; it only affects the privileges. Refer to answer made to comment n°2 from John Morgan.

comment

60

comment by: *FlyerTech Ltd*

[Attachment #1](#)

Dear sir

Please see the attached letter from FlyerTech Ltd.

response

Not accepted

The Agency agrees with the commentor that holding a Part-66 licence when working in a subpart G approved organisation brings an additional benefice, but is above the rule, as it is only required for airworthiness review staff. However, the privileges given by a Part-66 licence are those described in 66.A.20. Ensuring continuing airworthiness management is not part of these privileges, and up to now there has not been any rulemaking request to modify this requirement to include personnel working under the privileges of M.A.711(a). Therefore, the criteria in 66.A.20(b) does not affect the personnel in the continuing airworthiness management organisations.

The requirement for holding a Part-66 licence mentioned in M.A.707(a)2 for the Airworthiness Review Staff is moderated by its AMC stating that meeting the criteria of 6 months maintenance experience is not required.

It is reminded that having the 6 months maintenance experience is a condition for ensuring a continued validity of the privileges granted by the licence, not for the renewal of the licence with its type ratings. Refer to answer to comment No. 21 from Tyrolean Airways.

comment

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comment by: *S Wiltshire*

It is with concern that I write to you with regard to Notice of Proposed Amendment (NPA) No 2007-04 Re-issuance of the Part-66 Aircraft Maintenance Licence

Being the Technical Director of an independent EASA Part M, Sub Part G organisation and a nominated post holder, I wish to express my reservations with this NPA. I currently have a number of staff with EASA Part 66 Licences, including myself, where the element of required practical experience will not be made available whilst fulfilling these continuing airworthiness roles.

The vast numbers of EASA Part 66 Licensed engineers working within continuing airworthiness, technical services roles appear to be affected by this NPA and I question what motivational signal does this sends to anyone considering remaining in this important field, when their efforts (in some cases over many years) to obtain EASA Part 66 Licence privileges, are disregarded? I would also question what will be the motivational reasons for anyone wishing to enter into this field, when these privileges that an aircraft engineer will have studied and worked to attain, are then removed once their practical experience requirements are not satisfied?

Whilst I do not disagree in principle that without practical experience, on a regular basis, an engineer's privileges could be considered lapsed, I would suggest that the experience, diligence and inherent safety awareness that a good EASA Part 66 Licensed engineer brings to a continuing airworthiness role, is as important as that same engineer signing a Certificate of Release.

If this path is to be taken by EASA, I would strongly recommend that the training, knowledge and experience that engineers working within the field of continuing airworthiness have, is recognised in some other way. Whether this is through a newly recognised qualification, or an equivalent Category C rating for the function of continuing airworthiness, it should send a signal to engineers both young and old, that continuing airworthiness roles are recognised as an important part of the overall safe operation of any aircraft. It should be evident that entering into this field of aircraft engineering will not penalise an engineer nor leave them with a stark choice, where taking one path ensures they keep their privileges but taking the other ensures they lose them and with it recognition of past achievements.

response

Not accepted

The concern expressed here is of similar nature of the one in comment No.60 from FlyerTech Ltd. Refer to the answer made to this comment.

resulting text

Refer to the resulting text at the end of the document.

TITLE PAGE: NPA 2007-04 - Re-issuance of the Part-66 Aircraft Maintenance Licence

p. 1

comment

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comment by: *Didier FOUCHE Sabena technics*

The name of this NPA can be confused regarding the Part 66 AML and Part 145 certifying staff authorisation issued by the organisation.

This NPA title concerns the Part 66 AML renewal, when the Part 66.A.20 b(2) is speaking about certification privileges issued by the Part 145 organisation.

Both are linked according to this NPA, but it could be interesting to add a specific chapter regarding the Part 66 AML renewal, to make the difference between the Part 66 AML renewal and the organisation certifying staff authorisation.

response *Partially accepted*

The Agency agrees that the intent of the NPA differs from the title of the NPA, and that is why it has been explained in the paragraph IV "Content of the draft decision". The new AMC 66.B.120 provides acceptable means to the competent authorities in this issue.

resulting
text

Refer to the resulting text at the end of the document.

A. Explanatory Note - IV. Content of the draft decision

p. 4

comment *61*

comment by: *DGAC France*

1. Although we were surprised to discover that working group 66.008 had worked outside its terms of reference, we appreciate the effort made to clarify the recent experience criteria for a Part 66 license holder. It is of great help to have additional guidance to help license holders to document their experience and NAA to be able to assess it.

2. DGAC France also concurs to keep the 5 years license validity and renewal process principle, the renewal process being based on a declaration from the applicant. At this renewal exercise opportunity, DGAC France agrees not to perform any systematic investigation. If needed, investigation could be performed on a case by case basis, independently of the license renewal.

3. Although the proposed AMC on recent experience can be considered as a good basis, DGAC France considers that the working group has not fully completed its work, as it has only addressed recent experience in Part 66 and not in Part M, Subpart F and Part 145:

According Part 66.A.20(b)(2),

"In the preceding two-year period he/she has, either had six months of maintenance experience in accordance with the privileges granted by the aircraft maintenance licence or, met the provision for the issue of the appropriate privileges."

According Part M.A.607(a)(1),

*"Certifying staff can only exercise their privileges, if the organisation has ensured that certifying staff can demonstrate that in the preceding two-year period they have either had six months of **relevant** maintenance experience*

or, met the provision for the issue of the appropriate privileges”

According Part 145.A.35(c),

*“The organisation shall ensure that all certifying staff and category B1 and B2 support staff are involved in at least six months **of actual relevant aircraft or component** maintenance experience in any consecutive two year period. For the purpose of this paragraph ‘involved in actual relevant aircraft or component maintenance’ means that the person has worked in an aircraft or component maintenance environment and has either exercised the privileges of the certification authorisation and/or has actually carried out maintenance on at least some of the aircraft type_ systems specified in the particular certification authorisation.”*

It is thus unclear whether the criteria introduced in AMC 66.A.20(b)(2) by NPA 2007-04 is also applicable in the framework of a Part F organisation or a Part145 organisation, or whether there should be additional criteria. This should at least be clarified and we believe there is a need for the group to work further on recent experience criteria according M.A.607(a)(1) and 145.A.35(c).

In particular, further work is needed to define what is required in addition by the additional words “relevant” in Part M, Subpart F, and “actual relevant aircraft or component” in Part 145 (It should be noted that Part 145 is clearly referring to the aircraft type, but the proposed AMC refers to “comparable” aircraft ?).

Paragraphs 145.A30(g), referring to criteria defined in “ Part 66 and 145.A.35”, and M.A.606(g), referring to Part 66, need also an AMC.

4. In addition, although recent experience is introduced in ICAO Annex 1, we wonder whether this requirement should not be withdrawn from Part 66. Not only, as explained above, existing requirements in Part 66 creates confusion between with Part M and Part 145, but they have no impact on the validity or the renewal of the licence, as they are only a condition to sign the CRS in Part M and Part 145. Such condition for CRS signature should only be in Part M and Part 145 with other conditions for CRS signature. Such radical solution could have the merit of clarifying the status of the 66 licence, which would then only be the recognition of the competence of a maintenance engineer at a given point in time. It would also have the merit of clearly linking the recent experience requirements to the conditions of the CRS (CRS by an independent AME following non complex maintenance, CRS in an approved environment on non commercial non large aircraft, CRS in an approved environment on large or commercial aircraft).

It should also be considered that when an AME got his licence he tends to forget the Part 66 conditions attached to it, but remains attached to complying with Part M and Part 145 requirements he is applying every day.

response *Partially accepted*

The Agency partially agrees with this comment.

The requirement in 66.A.20 is not to be understood as additional requirement to 145.A.30(c) and M.A.607(a), however the Agency understands the commenter's concerns and several rulemaking tasks are taking place to remove the requirements in 145.A.35(c) and M.A.607(a) to place them in a single 66.A.20(b) paragraph. This will simplify the rule.

This requirement does not only apply to personnel holding a existing licence

category A, B1, B2 or C, but also to any additional licensing categories proposed by future rulemaking tasks. It also applies also independently wherever they are employed by a Part-145 approved organisation, by a subpart-F but also as an independent licensed engineer (M.A.801(b)2).

These are additional reasons driving the Agency to modify Part-145 and Part-M and to keep a single requirement in 66.A.20(b). By doing so there is not need to add any AMC to Part-145 and Part-M.

The criteria of "comparable aircraft" modified to read "aircraft of same technology, construction and systems" will affect all these personnel.

On remark 3 about AMC 66.A.20(b)(2) introduced by NPA 2007-04 to whether it is applicable in the framework of a Part-F organisation or a Part-145 organisation, the paragraph of the AMC does not make a difference between organisations, being applicable to both. The experience criteria provided in the AMC is general and organisations are allowed to develop it further and to adapt it to their own needs.

The Agency agrees with your remark that the additional words "relevant" in Part M, Subpart F, and "actual relevant aircraft or component" in Part 145 differ and the AMC has been modified to recommend that the experience should be shown on "at least one aircraft type of same technology, construction and systems within the same sub-category of licence".

On remark 3, regarding the need to add AMC for 145.A30(g), referring to criteria defined in " Part 66 and 145.A.35", and M.A.606(g), referring to Part 66, the Agency considers that this is a subsequent amendment that will need to be clarified by the future rulemaking tasks on Part-145 and Part-M as it is described in first paragraph of this answer.

On remark 4, the Agency agrees that it may have seemed more logic to place this experience requirement in Part-145 and Part-M than in Part-66, but for the reasons explained above, and because it is affecting the privileges of the license and because there are multiple categories of licences, Part-66 is more appropriate rule for this requirement. The line 6 at page 2 of the licence itself recalls the holder that the "6 months maintenance experience in accordance with the privileges is required". The renewal of the licence every 5 years may be a good opportunity to remind these conditions.

resulting
text

Refer to the resulting text at the end of the document.

B. DRAFT DECISION - General comments

p. 5

comment

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comment by: GLOBALIA

I agree with the requirement of recent experience in maintenance as established in 66.A.20 (b) but AMC66.A.20 (b) 2 as is written concentrates in developing requirements of recent experience for present Licensed personnel that acts as certifying staff where there can exist in base maintenance environments licensed personnel that do not act as certifying staff (A and B1,B2 licensed mechanics) and only acts as support staff.

66.A.20 (b) 2 includes "met the provision for the issue of the appropriate privileges". This provision allows those personnel to become certifying staff at

any time providing they have requested experience and meet (b)1 and 3 requirements. This provision is not appropriately reflected in proposed AMC.

Maintenance Organisations are only responsible to keep records of Certifying Staff and B1 & B2 Support Staff. Maintenance Organisations should not be responsible to keep records of all aircraft maintenance license holders that work in the organisation.

It is very difficult to have an individual log book for all tasks performed. The Quality Manager should be able to raise a certificate of experience based on the maintenance records kept by the organisation without the need of an individual log book.

response *Partially accepted*

The personnel working as « supporting staff » are not required to meet the criteria of 6 months maintenance experience because 66.A.20(b) states that this conditions shall be met to exercise the privileges of the licence. Privileges are described in 66.A.20(a), and do not include the supporting staff activity. Regarding your point n°2 about “or met the provision for the issue of the appropriate privilege” means that when an applicant applies for the endorsement of a new type rating, he shall meet the criteria for the issuance of the type rating described in the rule at 66.A.45. It has not been the intent of this rulemaking task to address this provision. Moreover, it was not the intent of the rulemaking task to modify Part-145 and subpart-F requirements on the procedure for keeping certifying staff records. The documented evidence of maintenance experience should be in the form of individual records. Any form of record which meets the criteria for maintenance experience described in this AMC is acceptable. However an individual log-book is a satisfactory solution.

resulting text

Refer to the resulting text at the end of the document.

B. Draft Decision - I. Amendments to AMC 66.A.20(b) 2

p. 5-6

comment

5

comment by: *Air Berlin*

We are in favour of the approach to credit also training/management/engineering/technical support/planning activities. But as in fact many employees in those areas are also licenced (many NAAs even set up de jure or de facto requirements that certain management staff **needs** to be licenced!), the possible credit portion of such activities should be increased from 20% to 80%, except if **each** of the listed activities could be credited. In such a case, the portion should be increased to 50%.

response

Not accepted

The activities in this paragraph which may replace maintenance experience have been introduced to take consideration of work carried out in training/management/engineering/technical/support/planning. However this cannot replace maintenance experience, which calls for practical hands-on maintenance practices, and it would not be reasonable to increase significantly the amount as proposed. Refer to comment from Aircraft Engineers

International (AEI) n° 38.
Refer also to answer to comment n°2 from John Morgan on not meeting the experience requirement.
There is no requirement for management staff to hold a Part-66 licence, except for the M.A.707 Airworthiness review staff, where the AMC states that such personnel may not meet the 6 months experience requirement at the time of the review.

comment 6 comment by: *Air Berlin*

The level of detail of the suggested individual experience log is too high. The wording should be changed to "documentation in an acceptable form and manner".

response *Not accepted*

Suggesting these details through an AMC aims to enhance harmonisation, understanding and free movement of licenses' holders.

comment 7 comment by: *DASSAULT FALCON SERVICE*

The chapter 66.A.20 (b) 2. is included in the 66.A.20 (b) 1. that makes reference to Part M and/or Part 145.
The concerned chapter in Part M and Part 145 should be detailed more if needed but this chapter 66.A.20 (b) 2. should be deleted because does not concern the licence but certifying staff.

response *Noted*

Your comment is of similar nature to comment No. 61 from DGAC France. Refer to answer to comment No. 61.

comment 10 comment by: *Didier FOUCHE Sabena technics*

Item 1: Duration: For the outside approved organisations, it's specified that "the number of days be reduced by up to 50% in certains circumstances, when agreed in advance by the authority."
It could be necessary to clarify what does "in certains circumstances" means and to give examples of such circumstances.

Item 2: Nature of expérience: the practical and theoretical training may be considered as relevant for maintenance experience.

response *Not accepted*

Item 1: Your comment is accepted, the paragraph 1. Duration has been modified.

Item 2: we think that you are referring to theoretical and practical experience required by 66.A.25 and A.30. In the Agency's opinion, the training for obtaining a licence cannot be considered as accumulated experience; so this cannot be accepted.

comment 12 comment by: *Didier FOUCHE Sabena technics*

Regarding the criterias listed to identify aircraft which are comparable, does it

need to comply with all of them or only with some of them.
Depending of the answer, it should be added "and" or "or" at the end of each line or to specify clearly that all the criterias have to be comply with.

response *Accepted*
Your comment is accepted as it is needed to specify that all conditions should be met together.

comment *13* comment by: *Didier FOUCHE Sabena technics*
It is understood that experience should include representative activities.
Regarding electrical system, depending of the countries, the authorities and sometime the organisation, such tasks are considered as B1 or B2.
That means that depending of the authority and country of origin of the organisation, the same tasks could be considered as B1 or B2 representatives activities.
So, for such tasks, how and by whom will it be validated as B1 or B2 representative activity?

response *Noted*
The Agency feels that it is not necessary to detail more the experience requirements with systems. The share of responsibilities between B1 and B2 licence holders for electrical and electronic systems is subject of NPA 2007-07.

comment *14* comment by: *Didier FOUCHE Sabena technics*
To better understand the case of combination of categories, it is understood that a category C + B1 and /or B2 category has to show experience in exercising release into service (associated to C privileges) **and** representatives maintenance activities associated to the B1 and / or B2 privileges.
A category C that only performs supervision of aircraft checks and release into service of such aircrafts, that means stricts base maintenance certifying staff activities, will lost his B1 and/or B2 privileges if he can not demonstrate that he also performed representative maintenances activities.

response *Noted*
Your understanding of the combination of categories is correct.

comment *15* comment by: *Didier FOUCHE Sabena technics*
For category C, the experience must include exercising the privileges held on at least one of the aircraft type endorsed on the authorisation.
Does that mean that the C privilege (base maintenance check supervision and release into service of the aircraft) can be exercised **one time** on at least one aircraft type of his authorisation, **even if the duration is lower than 6 months**, or that the category C privilege must be exercised **for at least 6 months** on one of the aircraft type endorsed on his authorisation?

	<p>Could you give more explanation on this matter?</p>
response	<p><i>Noted</i></p> <p>Your second interpretation of this paragraph is correct, the personnel holding a category C licence must demonstrate that he has exercised his privilege shown by his licence during a period of at least 6 months within the last 2 years and this on at least one of the type of aircraft endorsed on his authorisation.</p>
comment	<p><i>16</i> comment by: <i>Didier FOUCHE Sabena technics</i></p> <p>It is specified that maximum of 20% of the experience may be gained as engineering, planning or instructor.</p> <p>In some organisations, those departments are specialised, that means that the personel involved does not exercised maintenance activities in the sense of this NPA. Even if they work in a maintenance environment and generally well mater the aircraft types for wich they are specialised.</p> <p>That means that such personnels will lost their Part 66 AML at the next renewal.</p> <p>That could engage social conflicts, even if we understand that they do not exercise their licences privileges currently.</p> <p>In particular the instructors that currently train mechanics on aircraft type or support practical training covering the whole aircraft. Their experience can be very similar to mechanics and they are very well aware about aircraft type improvment and modifications.</p> <p>We think that for such category of personnel, the experience gained the instructor should be totally taken into account and not limited to 20%.</p>
response	<p><i>Not accepted</i></p> <p>Your interpretation is not correct, this personnel will not lose his licence at next renewal. Please refer to answer to comment No. 2 from John Morgan. This is clarified by GM 66.A.40.</p>
comment	<p><i>18</i> comment by: <i>Theisen André</i></p> <p>Proposed text: Depending on the category of the aircraft maintenance licence, the following activities are considered representative activities relevant for maintenance experience.</p> <p>Reason: Consistency with further text.</p>
response	<p><i>Noted</i></p> <p>The wording has been checked and it seems that both versions are correct.</p>
comment	<p><i>19</i> comment by: <i>Theisen André</i></p> <p>Attachment #2</p> <p>Proposed text:</p>

Aircraft of similar technology, construction and systems are identified by similarity code in 'Appendix 1 Aircraft Type Ratings For Part-66 Aircraft Maintenance Licence'.

Reason:

The implementation of the principle of aircraft of similar technology, construction and systems (comparable aircraft) is appreciated.

The same paragraph will and has to be used by AMO's to establish Part-145.A.35 (c) experience requirements for CRS certification authorisations.

However, the current NPA will add an additional burden to individual licence holders, Part-145 / Subpart F AMO and NAA's to establish similarity (comparability) of aircraft.

Moreover, AML licence holders, AMO's and NAA's will have different interpretation of similar technologies etc.

This should be avoided by establishing similarity (comparability) of aircraft at the agency's level by a Panel of Experts (EASA, NAA's, Engineer's, TCH, AMO's) and integrating same as similarity (comparability) code into Appendix 1 Aircraft Ratings For Part-66 Aircraft Maintenance Licence.

Attached is a Matrix, prepared to show interpretation of similar technology based on a Part-145 Approval Schedule.

response *Partially accepted*

Although we agree on your idea, it is impossible to create criteria of similarity at the level of the Agency through the use of Appendix 1 to AMC to Part-66 "Aircraft type ratings". The reason is that similarity may combine not only similar aircraft of one manufacturer, but similar aircraft of different manufacturers, and the combination of aircraft types may result in a huge number of possibilities. This is possible only at the level of maintenance organisations where the number of combination becomes more manageable. It is the Agency's opinion that the criteria of similarity are detailed enough to ensure harmonisation.

comment 22

comment by: *TYROLEAN AIRWAYS*

Pg 6 first para:

There are not (necessarily) type authorisations in a Cat A authorisation.

Interfaces with Pt-M App VII and for certifying staff outside approved organisations were not considered

response *Not accepted*

Holders of category A licences must attend training on tasks which are associated to aircraft types, therefore the authorisations provided by organisations are related to tasks associated to aircraft types.

The independent licences holders working outside a maintenance organisation have been considered in para 1 "Duration" under the designation of personnel working under M.A.801(b)2.

There is no link between this NPA and the list of complex maintenance tasks in the Appendix VII, as these are tasks that cannot be carried out by independent M.A.801(b)2 certifying staff, but they must be carried out in maintenance organisations.

comment	<p data-bbox="352 208 392 237">30</p> <p data-bbox="1182 208 1437 237">comment by: SAN</p> <p data-bbox="352 264 1437 327">the nature of the experience should be better detailed in terms of minimum number of activities necessary to be recorded within the 6 months period.</p> <p data-bbox="352 360 533 389">For example:</p> <p data-bbox="352 423 1437 521">For category C, the experience should include exercising the privileges held on at least one of the aircraft types endorsed on the authorisation. A minimum of xxxx release to service are requested within the 6 month period</p>
response	<p data-bbox="352 544 539 573"><i>Not accepted</i></p> <p data-bbox="352 600 1437 857">The Agency understands the commenter's comment, it is considered to be too restrictive to add a requirement on recording the number of times the maintenance activity or the privilege has been exercised for the personnel holding a licence category C. This may create also burden in updating the records. It is the Agency's opinion that for category C certifying staff, exercising the privilege held on his licence during a period of 6 months and this on at least one aircraft endorsed on his authorisation is an acceptable mean of compliance with the requirement.</p>
comment	<p data-bbox="352 920 392 949">31</p> <p data-bbox="1098 920 1437 949">comment by: Ian Wilson</p> <p data-bbox="352 976 1437 1294">This proposed process will lead to the removal (at worst) or the suspension (at best) of type rated licences held by people engaged in the management process such as quality managers and auditors who are not permitted to exercise certification privileges but are still required to have Continuation and HF training to the same standard as type rated engineers. If a quality manager or auditor ceases to carry out that function he will have to re-qualify as a type rated engineer to be able to resume his profession. The quality manager or auditor if he or she is undertaking product audit is as much engaged in the process of continuing airworthiness as the Category A, B1 or B2 staff who undertake the task.</p>
response	<p data-bbox="352 1323 600 1352"><i>Partially accepted</i></p> <p data-bbox="352 1379 1054 1408">Refer to answer to comment n°2 from John Morgan</p>
comment	<p data-bbox="352 1469 392 1498">32</p> <p data-bbox="1098 1469 1437 1498">comment by: Phil Young</p> <p data-bbox="352 1525 1222 1554">1) AMC.A.20 (b) 2 Privileges Paragraph 2 Nature of Experience.</p> <p data-bbox="352 1559 1437 1621">This paragraph suggests that 'Aircraft are comparable if the following items are comparable' Engine (e.g. Fadec/Non Fadec/Wankel/Diesel)</p> <p data-bbox="352 1626 1437 1720">This would seem to indicate that if an Engineer worked on a B737NG (therefore Fadec) his experience would be relevant to A320 (also Fadec) but would exclude him from B737 Classic (Non Fadec).</p> <p data-bbox="352 1724 1437 1787">This lacks consideration as there is a lot more commonality between a B737 NG & B737 Classic than and Airbus.</p> <p data-bbox="352 1792 1437 1854">Taking this further there is more commonality between a B777(Fadec) and a B737 Classic than an Airbus and a B737NG.</p> <p data-bbox="352 1859 1437 1921">Would it not be more sensible to use the Manufacturer as the comparison factor?</p> <p data-bbox="352 1926 1437 1989">2) A maximum of 20% of the experience duration required may be replaced by the following relevant activities on a comparable aircraft:</p> <p data-bbox="352 1993 1385 2022">Aircraft maintenance related training as an instructor/assessor or a student;</p>

Maintenance technical support/engineering;
 Maintenance management/Planning.
 As a licensed Engineer working in Quality Assurance I cannot give up six months (less 20%) out of every two years to maintain recency.
 I have no wish to loose my licence as I may need to return to that sort of work especially in an industry where job security is questionable.
 My type rating is only as good as any Authorisations that may be added by an PART 145 employer, so what safety advantage is there by my having to submit experience requirements to my competent authority.
 If Instructors/Managers/Planners/Project Engineers/Quality Engineers are to be excluded from retaining licences then eventually they will no longer enter these jobs with licence experience. This will be a big disadvantage to safety.

response

Partially accepted

- 1) Further an internal check the text was modified to remove some conditions for similar aircraft, and your remark supports the resulting text.
- 2) Partially accepted, refer to answer to comment no.2 from John Morgan.

comment

33 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

~~The required 6-month experience should be on aircraft structure, powerplant and systems as appropriate to the category or subcategory and relevant to the type or group rating held.~~

-

~~Experience should be supported by documentary evidence.~~

-

The 6 months maintenance experience in 2 years ~~should~~ **must** be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of aircraft, type of operation and maintenance.

1. Duration:

Within approved maintenance organisations:

-

- 6 months continuous employment within the same organisation in one block period; or

- 6 months employment within the same organisation split into different blocks; or

- 100 individual days of experience accumulated in different organisations.

- **This must be registered in the owner's Log-Book.**

Outside approved organisations:

-

- 100 days working as certifying staff according to M.A.801(b)2:

- The number of days may be reduced by up to 50% in certain circumstances, when agreed in advance by the authority. **(This circumstances will be previously defined by EASA).**

- **This must be registered in the owner's Log-Book.**

2. Nature of the experience:

Depending on the category of the aircraft maintenance licence, the following

activities are considered relevant for maintenance experience:

- Servicing;
- Inspection;
- Operational and functional testing; - Trouble-shooting;
- Repairing;
- Modifying;
- Changing component;
- Supervising these activities;
- Releasing aircraft to service.

[This must be registered in the owner's Log-Book.](#)

For category A certifying staff, the experience should include exercising the privileges, by means of representative tasks, on at least one of the aircraft types endorsed on the authorisation. [This must be registered in the owner's Log-Book.](#)

For category B1 and B2, the experience should include exercising the privileges, by means of representative activities. [This must be registered in the owner's Log-Book.](#)

For every aircraft type included in the authorisation, experience should be shown on at least one comparable aircraft within the same sub-category. Aircraft are comparable if the following items are comparable:

- a) Propulsion (e.g. turboprop/turbofan/turboshaft/jetengine/pushpropeller);
- b) Engine (e.g. Fadc/non-Fadc/Wankel/diesel);
- c) Flight controls (e.g. mechanical controls, hydraulically powered controls, electrically powered controls);
- d) Avionics (e.g. analog/digital);
- e) Material (e.g. aluminium/ composite/ combinations/ wood);
- f) Construction (e.g. bonding/ riveting/ welding).

[This must be registered in the owner's Log-Book.](#)

For category C, the experience should include exercising the privileges held on at least one of the aircraft types endorsed on the authorisation. [This must be registered in the owner's Log-Book.](#)

For a combination of categories, the experience should include some activities of the nature shown in paragraph 2 in each category. [This must be registered in the owner's Log-Book.](#)

A maximum of ~~20%~~ 30% of the experience duration required may be replaced by the following relevant activities on a comparable aircraft:

- Aircraft maintenance related training as an instructor/assessor or a student;
- Maintenance technical support/engineering;
- Maintenance management/planning.

[This must be registered in the owner's Log-Book.](#)

The experience should be documented in an individual log book ~~or~~ and as database records kept by the approved maintenance organisation. [The referred](#)

Log-Book should be kept in the NAA, available for modification and consultation by the owner. The Log-Book must be provided/sold by the NAA, according to a model from EASA. The level of detail should include the following as appropriate:

- a) Date;
- b) Aircraft type;
- c) Aircraft identification i.e. registration;
- d) ATA chapter ~~(optional)~~;
- e) Operation performed i.e. 100 FH check, MLG wheel change, engine oil check and complement, SB embodiment, trouble shooting, structural repair, STC embodiment...; f) Type of maintenance i.e. base, line;
- g) Type of activity i.e. perform, supervise, release;
- h) Category used A, B1, B2 or C.

This must be registered in the owner's Log-Book.

Remark: as per article 5 of regulation 2042/2003, this experience requirement does not apply to:

- Certifying staff issuing a certificate of release of aircraft as per M.A.607(b);
- Pilot-owner certifying tasks according to M.A.803; and
- Certifying staff outside of the EU as provided for by 145.A30(j) and Appendix IV of Part-145.

Justification:

As the issue of Air Safety is the most important subject of all, we would suggest that EASA could implement such a Log-Book with the minimum basic administrative records necessary, as an example for the industry to follow and/or upgrade. There are already some examples around, like the one from ALAE, in England. One may think it would be much trouble for EASA to handle, but if we consider the need for standards in the aviation business, such minimum requirements in the logbook as example, could imply less work in the future, when the need for a standard in this matter will be urgent.

response *Partially accepted*

The wording by the Agency in AMCs doesn't allow the use of "shall", but "should" must be written instead. The reason is that AMC are not implementing laws.

Please refer to the following FAQ at this page of the Agency's web site: http://www.easa.europa.eu/home/rm_faq_th5.html

We understand your point that all records of maintenance experience should be recorded on the licence holder's individual log-book, but it is not necessary to repeat the information at each paragraph.

The log-books are individual, and the authority cannot oblige to keep them within the NAAs. Provisioning the log-books may be made at national level by the NAA, but any recording of maintenance experience data which meet the AMC is acceptable.

The possibility of reducing the 100 days under certain circumstances has been added to the AMC.

Your proposal for replacing 20% by 30% was not supported by enough justification.

comment 36

comment by: *Nayak Aircraft Service GmbH & CO KG*

In our opinion there is no necessarily reason to change this paragraph under Part 66. Every 145 organisation must have procedures to evaluate Licence

holder into their organisation. These procedures are mostly very strict and will be audited by the NAA's anyway. If no evidence of documentation is present the 145 organisation must delete the individual type out of his Company Authorization document. In the other way the procedure will have a way to evaluate a licence holder without current Company Authorization Document on the type entered. (Training under supervision, new Type course, Assessment ect.)

response *Noted*

Your point is correct. It is the responsibility of organisations providing certification authorisations to ensure compliance of the 6 months experience. However the independent 66 licence holders working under M.A.801(b)2 have no authorisation, and it is on them to ensure the continued validity of their privilege. Please refer to the answers made to the French DGAC under comment n° 61.

comment 37 comment by: *Aircraft Engineers International (AEI)*

1. Duration:

Within approved maintenance organisations:

- 6 months continuous employment within the same organisation in one block period; or
- 6 months employment within the same organisation split into different blocks; or
- 100 individual days of experience accumulated in different organisations.

Outside approved organisations

- 100 days working as certifying staff according to M.A.801(b)2;
- The number of days may be reduced by up to 50% in certain circumstances, when agreed in advance by the competent authority.

Justification:

The term "competent" is used throughout the regulation. This has obviously been omitted here.

response *Accepted*

Refer to resulting text.

comment 38 comment by: *Aircraft Engineers International (AEI)*

A maximum of 20% of the experience duration required may be replaced by the following relevant activities on a comparable aircraft:

- Aircraft maintenance related training as an instructor/assessor or a student;
- ~~- Maintenance technical support/engineering;~~
- ~~- Maintenance management/planning.~~

Justification: The stricken through functions are TOO REMOTELY connected to

the actual activity of gaining hands on experience on aircraft, whereas the maintenance training at least could be closely involved in this activity. Therefore we mean that these 2 functions should not be able to qualify.

response *Not accepted*

The Agency considers that a maintenance personnel which is involved in the management of continuing airworthiness and/or maintenance planning is still involved in subjects related to the maintenance of aircraft structures, systems. This part of time spent on these activities should not be underestimated. This is why part of this activity has been accepted but the remaining 80% should consist of real maintenance practices.

comment 39 comment by: *Aircraft Engineers International (AEI)*

1. Duration:

Within approved maintenance organisations:

- 6 months continuous employment within the same organisation in one block period; or
- 6 months employment within the same organisation split into different blocks; or
- ~~100~~ 130 individual days of experience accumulated in different organisations.

Outside approved organisations

- ~~100~~ 130 days working as certifying staff according to M.A.801(b)2;

Justification:

The equivalent of 6 months = 26 weeks = 26 x 5 days = 130 days. There should not be a different standard for people dependent on which way they are employed.

response *Not accepted*

The 100 days has been proposed as similar to 6 months period when taking into account the possible days-off within a working period.

comment 40 comment by: *Aircraft Engineers International (AEI)*

1. Duration:

Within approved maintenance organisations:

- 6 months continuous employment within the same organisation in one block period; or
- 6 months employment within the same organisation split into different blocks; or
- 100 individual days of experience accumulated in different organisations.

Outside approved organisations

- 100 days working as certifying staff according to M.A.801(b)2;
- The number of days may be reduced by up to 50% in certain circumstances that are clearly defined in § xx of this AMC, when agreed in advance by the authority.

Justification:

To obtain a LEVEL playing field, and to make sure that ONE STANDARD is applied throughout the EASA countries, it is absolutely necessary to CLEARLY DEFINE the circumstances under which the competent authority is allowed to reduce the number of days. Not only that, it should also be specified how many % reduction is allowed in the different cases. 50% is a large amount, so it should not be left to the individual authority to determine how much reduction will be given. In addition there is a provision further on in this AMC where a part of the experience may be replaced by other activities, this adds even further to the possibility of a "sloping" playing field. This possibility to deviate from the norm should therefore be strictly controlled.

response *Partially accepted*

Your remark has been taken into consideration and the AMC has been amended.

This possibility of reducing the number of days below 100 days is limited to the case of licence holders working under M.A.801(b)2 i.e. where an owner carries out maintenance on his own aircraft, or a licence holder carries out maintenance on aircraft with low rate of use which gives difficulties to accumulate experience.

comment

41

comment by: *Airbus Transport International*

A Maximum **of 50%** of the experience duration required may be replaced by the following relevant activities on a comparable Aircraft ...

Justification:

All that people in charge of Training, technical support and maintenance management planning are skilled personnel with long and important experience and knowledge of maintenance practices that have not to be recognized as marginal. Some of them will have to continue their job on maintenance working party (may be as certifying staff) others will continue as C certifying staff and need recognition of their technical desk job that very often leads to expertise on the aircraft.

response

Not accepted

Refer to answer made to comment n° 5 from Air Berlin.

comment

42

comment by: *Airbus Transport International*

The experience should be documented in an individual logbook or as database records or by an organization statement covering maintenance function and duration for organism working on single aircraft type....

Justification:

Some organization are only working on single type of aircraft, it is obvious that personnel in charge of maintenance with defined maintenance function, have maintenance experience .

Individual logbook is not necessary for those personnel to summarize their experience. A simple statement showing duration of employment, and maintenance function with duration, insuring that these personnel have not long absence period during this last 2 years, may be sufficient for renewal.

response *Partially accepted*

Although we agree with the intent of your comment, the rule and AMC does not detail particular cases i.e. the maintenance organisation has a restricted scope of work limited to one aircraft type. However this does not prevent the organisation from issuing a statement to the holder, as soon as the details required by the paragraph are mentioned in the statement.

comment

43

comment by: *Theisen André*

Suggested text: For every aircraft type included in the authorisation, experience should be shown on at least one aircraft of similar technology, construction and systems.

Reason: Consistency with wording used throughout various Parts. The proposed wording is in Part-145.A.30 (j)(5)(i).

response *Accepted*

Refer to resulting text

comment

44

comment by: *Theisen André*

Attachment [#3](#)

Differentiate between B1 and B2 criteria for comparable aircraft.

The attached matrix shows that some aircraft type are comparable except for the avionics system. This should not affect a B1 licence holder of claiming experience on comparable aircraft.

Same is valid for B2 licence holder if the avionic system is similar technology with a difference in e.g. construction.

response *Partially accepted*

This NPA does not prevent a maintenance organisation to establish criteria of aircraft of same technology construction and system for B1 and a different criteria for B2.

comment

45

comment by: *Régional*

The 6 months maintenance experience in 2 years should be understood as consisting of two

elements, duration and nature of the experience. The minimum to meet the requirements for these

elements may vary depending on the size and complexity of aircraft, type of operation and

maintenance.

1. Duration:

Within approved maintenance organizations:

- 6 months continuous employment within the same organization in one block period; or
- 6 months employment within the same or **different** organizations split into different blocks; or
- 100 individual days of experience accumulated **within the same** or in different organizations.

Justification:

The systems of quantification of the individual experience are different from a maintenance organization in the other one but also from a country to the other one.

It is important that all the modes of calculations are authorized to avoid to punish the staffs.

Indeed, only the staff having a sufficient recent individual experience can be authorized to pronounce the APRS and all the demonstrations of experience must be acceptable.

Furthermore, the French authority imposes since 2004 to quantify the individual experience of the staff in calendar days and all the maintenance organizations put themselves in conformity with this requirement. The passage in another mode of calculation could impose important modifications of the systems of counting.

response *Partially accepted*

Refer to answer made to the comment n° 62 from the French DGAC.

comment 47

comment by: ENAC

Duration:

1. It is not clear if "6 months of continuous employment" means also "accumulating maintenance experience", or "just employed by an approved organisation".
2. How many actual days of maintenance experience are inside these 6 months ?
3. For individuals that work in different organisations the minimum duration is 100 days: why a different criteria ?
4. In general, however, how many minimum maintenance experience hours in a day are necessary to consider a "working day" valid ?
5. Anyway we question if this meets ICAO minimum standard. (6 months)
6. There is also no guideline on the criteria to reduce the minimum experience up to 50%
7. It seems that a person having added by a Competent Authority a new

rating on the AML with 4 months of experience should still wait two further months to obtain a Company Authorisation from a Part-145 AMO for such aircraft. If this is the meaning, the Part-145 should be armonised to be consistent with Part-66.

Experience:

It is not clear if there is a minimum number of points among a,b,c,d,e,f, to cosider two aircraft "*comparable*". Is just one point enough? All points are needed

In addition: if a person doesn't meet the criteria to renew the authorization, what is the right path to recover it?

Suggestion: the text should be better integrated with actual contents of Part 145 and Part M.

response

Not accepted

The 6 months or 100 days period is related to the duration of the experience. It does not depend whether the person is employed by the organisation or not. The calculation of duration can be done in months or in days. Both criteria are acceptable methods for the calculation of experience duration.

The paragraph has been modified to reflect that within or outside organisations, 6 months can be replaced by 100 working days.

The difference between 6 months and 100 days is coming from the days off planned within the year.

The intent of the rule is not to consider the details of work inside a working day, neither the number of hours. Meeting the nature of the experience as described in §2 is sufficient.

However, the Agency understands the commenter's concerns and several rulemaking tasks are taking place to remove the requirements in 145.A.35(c) and M.A.607(a) to place them in a single 66.A.20(b) paragraph. This will simplify the rule. Refer to answer made to comment from French DGAC n° 61 in §4.

This is an acceptable means of compliance to the rule which is aligned with the SARPs.

The criteria to consider aircraft of similar technology has been modified to simplify it and clarify that all criteria should be met.

Not meeting the criteria in 66.A.20(b)2 can be regained by accumulating 6 months of experience and demonstrating as necessary.

comment

48

comment by: CAA-NL

~~A maximum of 20%~~ Some of the experience duration required may be replaced by the following relevant activities on a comparable aircraft:

- Aircraft maintenance related training as an instructor/assessor or a student;
- Maintenance technical support/engineering;
- Maintenance management/planning.

Justification:

This text gives some more flexibility to take into consideration the relevance of the total work experience of the related time period.

response

Not accepted

The wording "some" cannot be introduced in the text as this may be understood differently by the licence holders, and it could be interpreted

differently by NAAs which would lead to unequal treatment.

comment

49

comment by: *Liaison with A.A - Alitalia Servizi Training & Personnel Certification*

The NPA n° 2007-4 makes reference only to the re-issuance of the Part 66 AML linked to own privileges provided by a relevant authorisation. This authorisation should be understood as Part 145 or Part M Subpart F Certification Authorisation.

Up to now, the Part 145 AMO as well as Organisations Part M subpart F are responsible for verification on the continuing airworthiness of maintenance activity for re-issuance of the relevant Certification Authorisation as per 145.A.35(c) and M.A.607. For Support Staff on duty is not required any Certification Authorisation but it is also necessary their AML re-issuance.

The AML Holders other than above, without Certification Authorisation, may not exercise any privilege on type ratings endorsed but keeping a continuing experience in an actual maintenance working environment due to a full time employment on that environment. They should have to get a re-issuance of the AML as per 66.A.40 (a). Besides those AML Holders, other than Support Staff, cannot exercise any privilege because without certification authorisation 66.A.20 (b)1.

Having said that, the required maintenance experience to perform for assuring the continuing airworthiness of maintenance activity, in accordance with Annex III 66.A.20(b)2, is now defined by two elements as duration and nature about the maintenance activity relevant to AML category. The subject should be clarified by more details for full time employments other than independent AML Holders as freelance workers. It is not clear what meaning has the term "duration". In other words, two meanings are applicable:

- the 6 months duration, for a full time employment in the same organisation, either continuing in one block or splitting into different blocks over the previous two years since AML expiring date (Annex III 66.A.20 (b) 2), makes reference as time slot within which the AML Holder, obeying his licence category privileges, has however been performing an unspecified quantity of events according to the relevant activity provided in the paragraph 2.

In both cases mentioned above, the AML Holder experiences continuing on actual maintenance working environment.

(editor's note - minor impact for organisation and holder himself).

or

- the 6 months duration has to be correlated with a defined quantity of events performed on the activity relevant for AML (sub)category provided in the paragraph 2. (editor's note - major impact for organisation and holder).

Justification:

More details about the item "duration of experience" shall be useful to prevent different rules applications due to different interpretations by different Competent Authorities.

This is to assure fair conditions and same treatment for any Part 66 AML Holder.

However, among the possible options reported on the Appendix I, the writing Organisation suggests to consider positively the number 1.b) which would be of minor impact either for AML Holders or AMOs' Part 145 or Part M Subpart F.

This is to affirm that, in case of any request by Competent Authority, the responsibility falls on the Aircraft Maintenance Licence Holder to provide the documentary evidence relevant to the maintenance activities only when the Holder has been exercising the privileges allowed by own Licence/Authorisation itself.

response *Noted*

The paragraph "Duration" in AMC 66.A.20(b)2 has been modified. It now clarifies that the 6 months experience can be gained by licence holders working in one or several organisations. It also reflects that the 6 months period can be replaced by 100 days working in an approved organisation or working according to M.A.801(b)2 or a combination of both.

Your understanding under the first paragraph in blue characters is correct, the 6 months period may be undertaken in one block or split in different blocks, but it is not linked to the number of certifications.

comment 50

comment by: *European Regions Airline Association*

The experience should be documented in an individual log book or as database records kept by the approved maintenance organisation. The level of detail should include the following as appropriate:

- a) Date;
- b) Aircraft type;
- c) Aircraft identification i.e. registration;
- d) ATA chapter (optional);
- e) Operation performed i.e. 100 FH check, MLG wheel change, engine oil check and complement, SB embodiment, trouble shooting, structural repair, STC embodiment...;
- f) Type of maintenance i.e. base, line;
- g) Type of activity i.e. perform, supervise, release;
- h) Category used A, B1, B2 or C.

The above paragraph will place a considerable additional burden on both the engineers and maintenance organisations alike in maintaining such records. Furthermore the NPA does not appear to put forward an adequate safety case to justify the need for a change in the rule and/or the AMC.

The Agency is requested to provide details of the safety case behind this NPA.

response *Not accepted*

The AMC has been enhanced by adding that any system managed by the organisation or the licence holder which can provide evidence of experience is also acceptable. The experience can be demonstrated by any mean other than a log-book i.e. organisation maintenance records.

It is the opinion of the Agency that there is no evidence that a safety case is needed as requested by the commenter's comment, the old AMC already stated that 'Experience should be supported by documentary evidence'.

comment	<p>53 comment by: <i>Nayak Aircraft Service NL</i></p> <p>Nayak Aircraft Service does not agree with the following text of NPA 2007-04 Amendments to AMC 66.A.20 (b) 2</p> <p>A maximum of 20% of the experience duration required may be replaced by the following relevant activities on a comparable aircraft:</p> <ul style="list-style-type: none"> - Aircraft maintenance related training as an instructor/assessor or a student; - Maintenance technical support/engineering; - Maintenance management/planning. <p>The maximum of 20% of the experience duration that may be replaced is not in relation to the area of work and experience of our employees who are active in aircraft maintenance training as instructor, technical support/engineering and maintenance management. They have a day to day involvement in aircraft maintenance; they are exposed to a wide variety of maintenance activities on several aircraft types, have contact with aircraft manufacturers, technical pilots and deal with AOGs on outstations, and we feel their valuable expertise and experience in this field should be translated to a substantial higher percentage.</p>
response	<p><i>Noted</i></p> <p>The Agency understands the commenter's concern, however the rule 66.A.20(b)2 requires that 6 months of experience should be demonstrated to ensure that this person still remain in the techniques of maintenance. The AMC describes in § 2 the nature of the experience.</p> <p>It is acceptable that experiences in maintenance management and training are also activities in similar subjects; however more than 20% of this experience cannot be considered as maintenance experience for the purpose of maintaining the privileges and comply with 66.A.20 (b).</p>
comment	<p>54 comment by: <i>UK CAA</i></p> <p>Increase the 100 individual days of experience to 120.</p> <p>120 individual days of experience accumulated in different organisations.</p> <p>Justification: 120 days is more equitable with the six months required in the other two options in this paragraph.</p>
response	<p><i>Not accepted</i></p> <p>Although your calculation of 6 months to 120 days is correct, annual days off should be included; this is why 6 months is calculated and rounded to 100 days.</p>
comment	<p>56 comment by: <i>CHC Scotia Ltd</i></p> <p>This proposed amendment to 66.A.20 (b)2 does not consider highly skilled experienced engineers who needed such qualifications to go into a quality assurance role within Part 145 and Continued Airworthiness Organisations in the first place and suggests that they would lose license qualifications at renewal time. So when they revert to a role of certifying engineers they would have to go through additional type training and costs involved. This would have a major damaging impact on the industry as not many people would be</p>

prepared to give up a qualification that they have worked hard and invested finance to achieve to move into any Quality departments. Remember people in these areas are critical to any aviation business and underline the safety aspects of the business.

Justification:

Today the Part 145 organisation is responsible for issuing authorizations only to those staff who have the type rated license and demonstrate recency and continuation training as well as competence checks and recommendation from supervisory and management. The license document is regarded as a qualification document only and all of the other aspects must be satisfied and documented before authorizations may be granted under the 145 approval. This is very well controlled today so why introduce this additional measure that will undoubtedly hurt many parts of the industry not to mention the costs to industry and individuals.

Finally I believe that this will lower safety standards as many people who hold licenses and are engaged in quality work will not want to lose qualifications, myself included.

response *Partially accepted*

This NPA does not modify the conditions for the renewal of the licence stated in the paragraph 66.B120 "Procedure for the renewal of an aircraft maintenance licence". Any personnel holding a Part-66 licence who does not meet the 6 months experience will not lose his licence nor the type ratings at renewal only because he is not meeting this requirement. The removal of a licence can be made only when not meeting the conditions in 66.B.500, as i.e. certifying the release of an aircraft when one the requirements of Part-66 is not met. The NPA affects only how you may keep the right of exercising the privileges of certifying staff.

Obtaining back this privilege may be gained by accumulating 6 months experience and demonstrating as required.

The paragraph AMC 66.B.500 has been removed.

comment 57

comment by: *Quality Team Manager*

The 6 months maintenance experience in 2 years, **for holding company approvals**, should be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of aircraft, type of operation and maintenance.

Justification:

This section needs to make it clear that the experience requirement is either for the issuing and holding of AMO approvals and not the condition for holding type ratings on a EASA part66 B1/B2 license. At present it can be interoperated that an engineer will have his type ratings removed and will not be able to renew his license if he/she fails to maintain recency. In many organisations you have management staff that will loose their type ratings and licenses because they will not meet the recency requirements. The only other option is to add Technical Management oversight onto the list of activities (para2).

response *Not accepted*

This AMC does not only apply to licence holders holding an organisation

approval, but also to independent licence engineers working under M.A.801(b)2. This is why your remark cannot be accepted. The justification provided a wrong interpretation, as a licence or a type rating cannot be removed when the requirement of 66.A.20(b)2 is not met any more. Please refer to answer made to comment n° 2 to John Morgan.

comment

62

comment by: *DGAC France*

Revise AMC 66.A.20 (b) 2, bullet 1 – duration as follows

"1. Duration:

Within approved maintenance organisations:

- 6 months continuous employment within the same organisation in one block period; or

- 6 months employment within the same organisation split into different blocks; or

- 100 individual days of experience ~~accumulated in different organisations.~~"

We consider that if 100 working days is acceptable for an AME working in different organisations it should also be acceptable for an AME working for the same organisation. Especially when we know that it is the way some organisations follow the recent experience of their employee in order to facilitate their management when they are entitled to work on different categories, groups or types of aircraft.

response

Accepted

Refer to the resulting text.

comment

64

comment by: *Swiss International Air Lines*

Ref. new AMC 66.A.20 (b) 2.

How will license holder be treated without having a company authorization when working within QA, Planning, Engineering (SB assessment)?

Will the licensed be revoked, suspended or limited? A clear definition is missing and needed to be drafted.

How an Engineer having lost her/his License base on AMC 66.A.20 (b) 2 and Part 66.B.500 will recover this License? Which Part 66 article? Which rules?

response

Noted

Any personnel holding a licence who does not meet the requirement of 66.A.20(b)2, does not lose his licence, or any type rating. He loses only the right to exercise his privilege under the terms of his licence.

Please refer to answer made to comment n° 2 to John Morgan.

Recovering back the authorisation to exercise his privilege is possible by gaining 6 months of maintenance experience as described in this AMC and demonstrating the experience as required.

comment

65

comment by: *Mann Aviation Group Engineering Ltd.*

The proposed amendment to 66.A.20 (b) 2 "Privileges" does not make

allowance for experienced licenced engineers that require these qualifications to transfer to a quality assurance position within a Part 145 approved or Continued Airworthiness Organisation. It does not address the requirement in the first place and then intimates that they would lose their license qualifications when it becomes due for renewal. Therefore, once they return to the role of certifying engineers they would need to go through additional Part 147 type training with all the attendant costs and time involved. This training already has a major damaging impact on our industry; therefore we believe the new proposal would affect an experienced engineer's decision to pursue a role in Quality, or for that matter Management at any level, as they would not be prepared to give up hard earned qualifications. It should be remembered that personnel in these key areas are also critical to the aviation industry where they underpin the safety issues associated with aviation.

We also believe that the proposal to allow only a maximum of 20% of the time spent as an instructor, maintenance manager or technical support engineer is totally unrealistic when these roles are held by highly experienced licenced engineers. These roles invariably demand a constant input on maintenance related activities and require the post holder to keep a much closer contact with the OEM's and OEM/NAA/EASA generated technical data and regulation than a certifying engineer working within a controlled environment.

Justification:

Currently a Part 145 organisation has responsibility for issuing company authorisations to engineers that have the necessary type rated license, can demonstrate adequate recency and continuation training. In addition to this they are responsible to assess the engineers competence and make recommendations from supervisory and management position. The actual engineering license is therefore regarded as a qualification document only as all aspects of the Part 145 companies procedures must be satisfied and documented before authorisations may be granted under the 145 approval. This activity is already well controlled and documented at present so introduction of the additional proposed measure will unquestionably cause disproportionate difficulty to many parts of the industry in addition to additional unwelcome costs to both industry and individuals.

Lastly, we fail to see how the proposed changes will improve safety standards as the vast majority of engineers that currently have aircraft licence cover will not want to lose any of their hard earned qualifications. We also feel that the proposed changes will drive the current industry wide transparency back underground as companies struggle to retain adequately approved engineers due to the additional costs, training requirements and general lack of attraction to the industry.

response

Noted

Refer to answer made to comment n°2 from John Morgan. No qualification would be affected when this condition is not met. The intent of the paragraph 66.A.20 is not modified with this AMC.

Regarding your request to modify the 20% of credit, please refer to answer to comment No. 53 from Nayak Aircraft Service NL

comment

66

comment by: *Monarch Aircraft Engineering Limited*

AFFECTED PARAGRAPH: 2. Nature of experience

The terms used; *exercising the privileges*

Should read *exercising the relevant Category A privileges*

Ditto *relevant Category B1 and B2 privileges*

Ditto *relevant Category C privileges*

JUSTIFICATION:

This makes it easier to read and understand and defines the relationship with the category and privileges.

response *Not accepted*

In the Agency's opinion there is not need for modifying the text as suggested. The privileges of a licence holder is what is mentioned on his licence. Exercising his privileges depend on the category and sub-category of licence and the type ratings endorsed on the licence with regards to the limitations mentioned on his license.

comment 67 comment by: *Monarch Aircraft Engineering Limited*

2. Nature of experience:
Para: Experience should be documented etc.....

Sub par e) Trouble Shouting – should read Trouble **Shooting**

Justification:
Typo error

response *Accepted*

Refer to the resulting text.

comment 69 comment by: *London Helicopter Centres Ltd.*

There appears to be some contradiction here. Both AMC66.A.20(b)2 and AMC 66.B.500 suggest that the experience requirements would apply at licence renewal, yet GM 66.B.120 states thus:

The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation ~~approved under Part-145~~ in ensuring validity of the ~~Part-145~~ certification authorisation (145.A.35(c) and M.A.607(a)1).

This requires clarification. If it is the intention of the NPA to require that all holders renewing licences must comply with the experience requirements of AMC 66.A.20(b)2, then this is both unnecessary and unacceptable. Unnecessary because the experience requirements are already taken care of very well in Part-145, the organisation issuing the authorisation does this assessment. Unacceptable because it would mean that a large number of licence holders, working in positions in technical services or quality departments, would be ineligible for licence renewal. Many individuals have invested an enormous amount of time, effort and money into gaining their

licence, and it would be unjust that they would be excluded from holding a licence. I can think of no other profession where this would happen. If one was to go to university and gain a degree in history, that degree stays with you for life, regardless of whether you work in a field connected to it.

Smaller companies would suffer most if this rule were to go through, many such companies (such as the one I am employed in) use very experienced licensed engineers in technical support and management roles, who can also double up as certifiers when the need arises. This would mean massive extra costs for these smaller companies, meaning many would go out of business.

If it is the intention of the NPA to place controls on those licence holders working outside a Part-145 organisation, then this must be done some other way.

Proposed text:

The process of licence renewal should stand as it is. Assessment of competence and experience is already performed by the 145 organisation when issuing authorizations.

Justification:

It is unacceptable to industry to place these restrictions on the renewal of licenses.

response *Partially accepted*

The proposed AMC 66.B.500 has been deleted.
Refer to answer made to comment n°2 from John Morgan.

comment 74

comment by: *Austro Control*

We suggest transferring all Part-145 and/or Part-M Subpart F related AMC text to the respective paragraphs in Part-145 and/or Part-M Subpart F or at least a reference should be made in the respective requirements of Part-145 and/or Part-M Subpart F to this Part-66 AMC.

AMC 66.A.20 (b) 2 Privileges

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sub-paragraph 2 Nature of the experience

General:

This paragraph and the following text should be divided between “within approved maintenance organisations” and “outside approved organisations” to clarify which elements are applicable for the different situation. (Like paragraph 1) A further division to the specific Part (145 or M/F) should be made too. For example: A Category A or C certifying staff is neither existing outside of a Part-145 organisation nor is it existing in a Part-M Subpart F organisation.

Second Subparagraph:

A category A certifying staff authorisation, based on a Part-66 AML – where no type rating is required – has normally task endorsements listed (according to Part-145) related to aircraft types. Therefore the wording “...on at least one of the ***aircraft types endorsed***...” should be changed to reflect the situation as mentioned above and to avoid possible misunderstanding of this subparagraph.

In addition to that this sub-paragraph is only applicable within Part-145 organisations.

Fourth Subparagraph:

The wording "...within the same sub-category." Should be changed to the following text: "...within the same **Part-66** sub-category."

-

Seventh Subparagraph:

This allowance of replacement of experience duration should be limited to persons working within a controlled environment (Part-145 and/or Part-M Subpart F organisation). Licence holders working outside of an organisation – as it is possible according to Part-M - are not considered to be within a controlled environment. Also the involvement in "maintenance technical support/engineering", maintenance management/planning" is questionable.

response *Partially accepted*

With regards to your first comment, please refer to answer to comment No. 61 from DGAC-France.

In the opinion of the Agency's the paragraph "2 Nature of experience" does not need to be split in "within approved maintenance organisations" and "outside approved organisations", as the content of maintenance tasks listed affect both categories of personnel.

Your remark to the second paragraph has been accepted. Refer to resulting text.

Your remark to the fourth paragraph has been accepted. Refer to resulting text.

The Agency can not agree with your comment to the seventh paragraph as it would represent an unfair treatment.

With regards to your last remark, please refer to answer to comment No. 38 to AEI.

resulting text

Refer to the resulting text at the end of the document.

B. Draft Decision - II. New AMC 66.B.500

p. 7

comment 8

comment by: *DASSAULT FALCON SERVICE*

As said in GM 66.B.120, the competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation in ensuring validity of the certification authorisation.

If the authority doesn't investigate, how will it be able to require the licence holder for documentary evidence of compliance of the licence to Part-66 such as experience requirements mentioned in 66.A.20(b) in order to revoke, suspend or limit the licence ?

response *Noted*

The competent authority may investigate at any moment that the requirements in M.B.500 are met. The competent authority may check that a licence holder has not be certifying the release of an aircraft if one of these conditions is not met. This would be a reason to revoke, suspend or limit a licence. However, he will not investigate the experience requirement at moment of the licence renewal, as this is not a condition for renewing the licence. Please refer to comment No. 2 from John Morgan.

comment 9 comment by: *DASSAULT FALCON SERVICE*

How a technician who had his licence revoked, suspended or limited can have it back if it was revoked, suspended or limited for a lack of experience ?
A technician can be affected to an administrative job for a limited period (customer support, project management, ...) and after this period, he can go back to maintenance or as a supervisor. He won't keep his certifying authorization if he is not involved in maintenance and then he will lost his licence.
Criteria for having the licence back should be described in this chapter.

response *Noted*

Not meeting the requirement of 66.A.20(b)2 does not limit, suspend or revoke a licence. It suspends only the continued validity to exercise the privilege mentioned on the licence.
Gaining back the continued validity to certify a CRS is made by accumulating and demonstrating the 6 months experience as required.

comment 17 comment by: *Didier FOUCHE Sabena technics*

The NPA explaines what are the conditions to suspend, limit or revoke an AML.

It would be appreciated to introduce a paragraph to introduce recommandations to recover such AML or to prevent such suspentions, limitations or revocations when it is shown that the experience duration requirements will not be reached into the time limit.
Such recommandations could introduce OJTs, complement theoretical training, several potential solutions economically acceptable by the organisation approved Part 145.

response *Not accepted*

Refer to answer made to comment n° 9 from Dassault or to n° 64 from Swiss International Airline

comment 20 comment by: *Air France*

Proposal: Delete AMC 66.B.500

Reason: As published in the context of this NPA on "Re-issuance of the Part-66 Aircraft Maintenance Licence", proposed AMC 66.B.500 text may infer that compliance with the Part 66.A.20(b) experience requirements should be checked upon each renewal of the Part 66 licence, therefore contradicting proposed GM 66.B.120.

More generally, proposed AMC 66.B.500 text should only be published in the context of broader advisory material on “revocation, suspension or limitation of the aircraft maintenance licence”, addressing in which context the NAA should initiate investigations (what should trigger the investigations ?), and specifying what and how to investigate, including on all 8 items of Part 66.B.500, but not limited to point 8 (“issuing certificate of release to service while not in compliance with this Part”).

Focusing on point 8 only, without any further advisory material on the general context of “revocation suspension, etc..”, is very misleading and may be understood by NAA’s as a legal obligation to verify compliance with the experience requirements on a systematic basis, which is clearly not the intent of this NPA.

response *Accepted*
AMC 66.B.500 has been deleted, and AMC 66.B.120 has been added to clarify the intent of the rule.

comment 23 comment by: *TYROLEAN AIRWAYS*
This para should only apply for "independent licence holder" and not for approved organisations. As well the wording "...authority may require licence holder" will lead to unequal treatment by different authorities.

response *Accepted*
AMC 66.B.500 has been deleted, and AMC 66.B.120 has added to clarify the intent of the rule.

comment 25 comment by: *Swedish Civil Aviation Authority (Luftfartsstyrelsen)*
The Swedish CAA wishes to support NPA 2007-04 as a whole. Though, we have a comment to the new AMC 66.B.500. We need some clarification on why the suggested text should be under the heading of “Revocation, suspension or limitation of the aircraft maintenance licence”.

response *Accepted*
Your remark has been accepted and paragraph AMC 66.B.500 removed.

comment 34 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*
The competent authority may require the licence holder for documentary evidence of compliance of the licence to Part-66, such as the experience requirements mentioned in 66.A.20(b). The purpose is to verify that the licence holder has been in compliance with the continued validity requirements for the privileges he has been exercising. [Such request and its results must be registered in the owner’s Log-Book.](#)

Justification:
Compliance and coherence with previous justification.

response *Not accepted*
The intent of a log-book or any system is allowing to collect maintenance data. You may record more than recommended, but this is not the intent.

comment

57 ❖

comment by: *Quality Team Manager*

The 6 months maintenance experience in 2 years, **for holding company approvals**, should be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of aircraft, type of operation and maintenance.

Justification:

This section needs to make it clear that the experience requirement is either for the issuing and holding of AMO approvals and not the condition for holding type ratings on a EASA part66 B1/B2 license. At present it can be interoperated that an engineer will have his type ratings removed and will not be able to renew his license if he/she fails to maintain recency. In many organisations you have management staff that will loose their type ratings and licenses because they will not meet the recency requirements. The only other option is to add Technical Management oversight onto the list of activities (para2).

response

Not accepted

This AMC does not only apply to licence holders holding an organisation approval, but also to independent licence engineers working under M.A.801(b)2. This is why your remark cannot be accepted. The justification provided a wrong interpretation, as a licence or a type rating cannot be removed when the requirement of 66.A.20(b)2 is not met any more. Please refer to answer made to comment n°2 to John Morgan.

comment

63

comment by: *Swiss International Air Lines*

66. B.500 Revocation, suspension or limitation of the aircraft maintenance license.

Today the main goal of the article 66.B.500 is to provide a tool for the different NAA in case of Safety issues or if one Engineer has been involved in one or more of the eight points listed.

The new AMC 66.B.500 (Conclusion option 1b of NPA) may require the authority to verify experience each time the renewal is requested.

Is the new AMC 66.A.20 (b) 2 requirements a safety issue?

From our point it is the responsibility of the Part 145 organization to authorize Certified Staff based on 145.A.35.

So why to transfer back this responsibility to the NAA? From our point of view it would be more logic to have a better control by the NAA of the Part 145 Authorization system.

From our point of view the wording of 66.B.120 and GM 66.B120 is in contradiction to AMC 66.B.500.

We fear that this new requirement will increase the administrative workload without any safety enhancement.

response *Accepted*

The AMC 66.B.500 has been removed in order not to link the conditions for renewal of the licence to this paragraph.

comment 68 comment by: *Monarch Aircraft Engineering Limited*

The requirement for the Competent Authority to require documentary evidence of compliance with part 66 is a Part 145 requirement not a Part 66 requirement.

Justification:
Part 145 requirement.

response *Not accepted*

This paragraph AMC 66.B.500 has been removed. The requested change cannot be implemented.

comment 69 ❖ comment by: *London Helicopter Centres Ltd.*

There appears to be some contradiction here. Both AMC66.A.20(b)2 and AMC 66.B.500 suggest that the experience requirements would apply at licence renewal, yet GM 66.B.120 states thus:

The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation ~~approved under Part-145~~ in ensuring validity of the ~~Part-145~~ certification authorisation (145.A.35(c) and M.A.607(a)1).

This requires clarification. If it is the intention of the NPA to require that all holders renewing licences must comply with the experience requirements of AMC 66.A.20(b)2, then this is both unnecessary and unacceptable. Unnecessary because the experience requirements are already taken care of very well in Part-145, the organisation issuing the authorisation does this assessment. Unacceptable because it would mean that a large number of licence holders, working in positions in technical services or quality departments, would be ineligible for licence renewal. Many individuals have invested an enormous amount of time, effort and money into gaining their licence, and it would be unjust that they would be excluded from holding a licence. I can think of no other profession where this would happen. If one was to go to university and gain a degree in history, that degree stays with you for life, regardless of whether you work in a field connected to it.

Smaller companies would suffer most if this rule were to go through, many such companies (such as the one I am employed in) use very experienced licensed engineers in technical support and management roles, who can also double up as certifiers when the need arises. This would mean massive extra costs for these smaller companies, meaning many would go out of business.

If it is the intention of the NPA to place controls on those licence holders working outside a Part-145 organisation, then this must be done some other way.

Proposed text:

The process of licence renewal should stand as it is. Assessment of competence and experience is already performed by the 145 organisation when issuing authorizations.

Justification:

It is unacceptable to industry to place these restrictions on the renewal of licenses.

response *Accepted*

The AMC 66.B.500 has been removed. Please refer to the resulting text.

comment 70

comment by: *Bristow Helicopters Limited*

B.II AMC 66.B.500

B.III GM 66.B.120

The statements in the referenced paragraphs are contradictory in that AMC 66.B.500 implies that the competent authority may review an engineer's experience when considering whether to renew said licence whereas GM 66.B.120 states that recent maintenance practice is not a condition for licence renewal. This last statement reinforces that made in GM 66.A.40 that has not been amended, which states that the *validity* of a maintenance licence is not affected by recency of maintenance experience but the *privileges* are. In the maintenance organisation environment the privileges of licensed engineers are controlled by the Quality Department of these organisations who will assess experience, recency, training and competence before issuing maintenance authorisations to individuals. This is a far more robust method of ensuring that only qualified personnel are permitted to carry out maintenance, and is open to audit by the competent authority at any time. The principal drawback to factoring recent experience into *licence* as opposed to authorisation renewal is that in most maintenance organisations there are a significant number of licensed engineers holding management and administrative posts that, although intimately involved with aircraft maintenance, are not at the practical level and there are serious concerns within industry that if the amendment is approved in its present form these engineers will be unable to renew their licences in the future. Not every engineer in this position is approaching retirement therefore the loss of the licence would severely curtail these individual's future employment prospects and the likelihood of loss of licence would deter capable engineers from taking up posts in engineering management and administration. This would be bad for the free movement of personnel within the Community and detrimental to the industry in general.

Justification:

The maintenance engineer's licence is a qualification that should not be withdrawn simply because an individual is not currently carrying out practical maintenance activities.

response *Accepted*

Your remark is accepted, and the text in AMC 66.B.500 has been removed. Refer to the resulting text.

However, refer also to answers to comments made under B. Draft Decision - General comments.

comment 75

comment by: *Austro Control*

The authority has to check and verify any pending revocation, suspension or variation action pursuant to 66.B.500 during the renewal process (according to Part-66.B.120). That means (in the case no other AMC is developed by the competent authority) this new AMC will be taken into consideration. This may lead to the situation that one authority is requiring and checking in any case documentary evidence, other authorities are checking nothing or just in specific cases which further on introduce an additional possibility of unequal treatment of licence holders within Europe.

In addition to that, the experience requirements of persons working within a controlled environment (Part-145, Part-M) are controlled via the issuance and renewal of a certification authorisation.

The only group of persons which are not controlled are the persons working outside a controlled environment.

The new AMC should be changed to ensure that in the case of a person working within a controlled environment the check of documentary evidence is restricted to the check if the person is still within this controlled environment and has a valid authorisation (not specific for any categories/ratings). In case of persons working outside of a controlled environment the check of documentary evidence should include a detailed check of the experience requirements.

response *Partially accepted*

This AMC to 66.B.500 has been deleted. However, the rule cannot be changed to make a different treatment to personnel within an organisation from personnel outside organisation. This would induce unfair treatment. However, the GM 66.B.120 has been modified to add "or on spot checks". Please refer to resulting text.

comment 77

comment by: AEA

II. New AMC 66.B.500 - AMC 66.B.500 Revocation, suspension or limitation of the aircraft maintenance licence. Page 7

"The competent authority may require the licence holder for documentary evidence of compliance of the licence to Part-66, such as the experience requirements mentioned in 66.A.20(b). The purpose is to verify that the licence holder has been in compliance with the continued validity requirements for the privileges he has been exercising. "

Proposal: delete AMC 66.B.500

Justification:

As published in the context of this NPA on "Re-issuance of the Part-66 Aircraft Maintenance Licence", proposed AMC 66.B.500 text may infer that compliance with the Part 66.A.20(b) experience requirements should be checked upon each renewal of the Part 66 licence, therefore contradicting proposed GM 66.B.120.

More generally, proposed AMC 66.B.500 text should only be published in the context of broader advisory material on "revocation, suspension or limitation of the aircraft maintenance licence", addressing in which context the NAA should

initiate investigations (what should trigger the investigations?), and specifying what and how to investigate, including on all 8 items of Part 66.B.500, but not limited to point 8 (“issuing certificate of release to service while not in compliance with this Part”).

Focusing on point 8 only, without any further advisory material on the general context of “revocation suspension, etc..”, is very misleading and may be understood by NAA’s as a legal obligation to verify compliance with the experience requirements on a systematic basis, which is clearly not the intent of this NPA.

response *Accepted*

The AMC has been deleted. Refer to the resulting text.

resulting text

Refer to the resulting text at the end of the document.

B. Draft Decision - III. Amendments to GM 66.B.120

p. 7

comment 24

comment by: *TYROLEAN AIRWAYS*

This GM should be raised to an AMC and also be incorporated in Pt-145 and Pt-M

response *Not Accepted*

In the resulting text, the GM has been moved to AMC. However there is no need to modify Part-145 and Part-M as the Agency intends to have rulemaking tasks to modify these paragraphs.

comment

35 comment by: *SITEMA – Sindicato dos Técnicos de Manutenção de Aeronaves*

The competent authority will ~~not be carrying out~~ carry out all investigations needed to ensure that the licence holder is in current maintenance practice as this is ~~not~~ a condition for the renewal of a licence in an approved maintenance organization ~~but a matter for the approved maintenance organisation approved~~ under ~~Part-145 in ensuring validity of the~~ Part-145 certification authorisation (145.A.35(c) and M.A.607(a)1).

Justification:

To prevent AMO from giving documentation proving technical proficiency without the License owner actually having performed that technical experience. Such case could lead industry trend to camouflage its needs for formation, either theoretically or practically.

response *Not accepted*

This proposal cannot be accepted because the authority has already the necessary tools in place to prevent an organisation providing false documentation and to revoke a licence as per 66.B.500 when a licence has been used outside of its privileges.

comment 57 ❖

comment by: *Quality Team Manager*

The 6 months maintenance experience in 2 years, **for holding company approvals**, should be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of aircraft, type of operation and maintenance.

Justification:

This section needs to make it clear that the experience requirement is either for the issuing and holding of AMO approvals and not the condition for holding type ratings on a EASA part66 B1/B2 license. At present it can be interperated that an engineer will have his type ratings removed and will not be able to renew his license if he/she fails to maintain recency. In many organisations you have management staff that will loose their type ratings and licenses because they will not meet the recency requirements. The only other option is to add Technical Management oversight onto the list of activities (para2).

response *Not accepted*

This change in text cannot be added because it is the responsibility of AMOs but also the responsibility of licence holders when they are not working in an AMO.

Refer also to answers provided under the same comments in B. Draft Decision - I. Amendments to AMC 66.A.20(b)2.

comment 69 ❖

comment by: *London Helicopter Centres Ltd.*

There appears to be some contradiction here. Both AMC66.A.20(b)2 and AMC 66.B.500 suggest that the experience requirements would apply at licence renewal, yet GM 66.B.120 states thus:

The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation ~~approved under Part-145~~ in ensuring validity of the ~~Part-145~~ certification authorisation (145.A.35(c) and M.A.607(a)1).

This requires clarification. If it is the intention of the NPA to require that all holders renewing licences must comply with the experience requirements of AMC 66.A.20(b)2, then this is both unnecessary and unacceptable. Unnecessary because the experience requirements are already taken care of very well in Part-145, the organisation issuing the authorisation does this assessment. Unacceptable because it would mean that a large number of licence holders, working in positions in technical services or quality departments, would be ineligible for licence renewal. Many individuals have invested an enormous amount of time, effort and money into gaining their licence, and it would be unjust that they would be excluded from holding a licence. I can think of no other profession where this would happen. If one was to go to university and gain a degree in history, that degree stays with you for life, regardless of whether you work in a field connected to it.

Smaller companies would suffer most if this rule were to go through, many such companies (such as the one I am employed in) use very experienced licensed engineers in technical support and management roles, who can also double up as certifiers when the need arises. This would mean massive extra costs for these smaller companies, meaning many would go out of business.

If it is the intention of the NPA to place controls on those licence holders working outside a Part-145 organisation, then this must be done some other way.

Proposed text:

The process of licence renewal should stand as it is. Assessment of competence and experience is already performed by the 145 organisation when issuing authorizations.

Justification:

It is unacceptable to industry to place these restrictions on the renewal of licenses.

response *Accepted*

Your remark is accepted, and the text in AMC 66.B.500 has been deleted. However, refer also to answers to comments made under B. Draft Decision - General comments.

comment 70 ❖

comment by: *Bristow Helicopters Limited*

AFFECTED PARAGRAPH:

B.II AMC 66.B.500

B.III GM 66.B.120

The statements in the referenced paragraphs are contradictory in that AMC 66.B.500 implies that the competent authority may review an engineer's experience when considering whether to renew said licence whereas GM 66.B.120 states that recent maintenance practice is not a condition for licence renewal. This last statement reinforces that made in GM 66.A.40 that has not been amended, which states that the *validity* of a maintenance licence is not affected by recency of maintenance experience but the *privileges* are. In the maintenance organisation environment the privileges of licensed engineers are controlled by the Quality Department of these organisations who will assess experience, recency, training and competence before issuing maintenance authorisations to individuals. This is a far more robust method of ensuring that only qualified personnel are permitted to carry out maintenance, and is open to audit by the competent authority at any time. The principal drawback to factoring recent experience into *licence* as opposed to authorisation renewal is that in most maintenance organisations there are a significant number of licensed engineers holding management and administrative posts that, although intimately involved with aircraft maintenance, are not at the practical level and there are serious concerns within industry that if the amendment is approved in its present form these engineers will be unable to renew their licences in the future. Not every engineer in this position is approaching retirement therefore the loss of the licence would severely curtail these individual's future employment prospects and the likelihood of loss of licence would deter capable engineers from taking up posts in engineering management and administration. This would be bad for the free movement of personnel within the Community and detrimental to the industry in general.

Justification:

The maintenance engineer's licence is a qualification that should not be withdrawn simply because an individual is not currently carrying out practical maintenance activities.

response

Accepted

Your remark is accepted, and the text in AMC 66.B.500 has been deleted. However, refer also to answers to comments made under B. Draft Decision - General comments.

comment

76

comment by: *Austro Control*

This GM should be changed to an AMC with the following text:

The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice in the case the licence holder is working within an approved maintenance organisation as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation in ensuring validity of the certification authorisation (145.A.35(c) and M.A.607(a)1). The authority may request the submittal of evidence that the licence holder is still working within an approved maintenance organisation and a copy of the valid certification authorisation.

In the case the licence holder is working outside of an approved maintenance organisation check of documentary evidence should include a detailed check of the experience requirements.

response

Partially accepted

The Agency agreed that the text be moved to an AMC. However the following paragraph could not be accepted as is, refer to answer to comment No. 75 in B. Draft Decision - II. New AMC 66.B.500.

resulting
text

Refer to the resulting text at the end of the document.

Appendix I. RIA - a. Purpose and intended effect

p. 8

comment

27

comment by: *GLOBALIA*

Emphasis should be addressed to the Maintenance Organisations instead of individuals

It would be desirable to make clear the difference between Maintenance Licensed personnel and certifying staff.

response

Not accepted

The purpose of the task was to address the conditions of the Part-66 licence re-issuance with regards to maintain the privileges associated to the licence; but not the certification authorisations within the maintenance organisations. The new AMC affect the certifying staff, as the maintenance licensed personnel not being certifying staff, have no privileges.

resulting

Refer to the resulting text at the end of the document.

text

comment

49 ❖

comment by: *Liaison with A.A - Alitalia Servizi Training & Personnel Certification*

The NPA n° 2007-4 makes reference only to the re-issuance of the Part 66 AML linked to own privileges provided by a relevant authorisation. This authorisation should be understood as Part 145 or Part M Subpart F Certification Authorisation.

Up to now, the Part 145 AMO as well as Organisations Part M subpart F are responsible for verification on the continuing airworthiness of maintenance activity for re-issuance of the relevant Certification Authorisation as per 145.A.35(c) and M.A.607. For Support Staff on duty is not required any Certification Authorisation but it is also necessary their AML re-issuance.

The AML Holders other than above, without Certification Authorisation, may not exercise any privilege on type ratings endorsed but keeping a continuing experience in an actual maintenance working environment due to a full time employment on that environment. They should have to get a re-issuance of the AML as per 66.A.40 (a). Besides those AML Holders, other than Support Staff, cannot exercise any privilege because without certification authorisation 66.A.20 (b)1.

Having said that, the required maintenance experience to perform for assuring the continuing airworthiness of maintenance activity, in accordance with Annex III 66.A.20(b)2, is now defined by two elements as duration and nature about the maintenance activity relevant to AML category. The subject should be clarified by more details for full time employments other than independent AML Holders as freelance workers. It is not clear what meaning has the term "duration". In other words, two meanings are applicable:

- the 6 months duration, for a full time employment in the same organisation, either continuing in one block or splitting into different blocks over the previous two years since AML expiring date (Annex III 66.A.20 (b) 2), makes reference as time slot within which the AML Holder, obeying his licence category privileges, has however been performing an unspecified quantity of events according to the relevant activity provided in the paragraph 2.

In both cases mentioned above, the AML Holder experiences continuing on actual maintenance working environment.

(editor's note - minor impact for organisation and holder himself).

or

- the 6 months duration has to be correlated with a defined quantity of events performed on the activity relevant for AML (sub)category provided in the paragraph 2. (editor's note - major impact for organisation and holder).

Justification:

More details about the item "duration of experience" shall be useful to prevent

different rules applications due to different interpretations by different Competent Authorities.

This is to assure fair conditions and same treatment for any Part 66 AML Holder.

However, among the possible options reported on the Appendix I, the writing Organisation suggests to consider positively the number 1.b) which would be of minor impact either for AML Holders or AMOs' Part 145 or Part M Subpart F.

This is to affirm that, in case of any request by Competent Authority, the responsibility falls on the Aircraft Maintenance Licence Holder to provide the documentary evidence relevant to the maintenance activities only when the Holder has been exercising the privileges allowed by own Licence/Authorisation itself.

response *Noted*

The paragraph "Duration" in AMC 66.A.20(b)2 has been modified. It now clarifies that the 6 months experience can be gained by licence holders working in one or several organisations. It also reflects that the 6 months period can be replaced by 100 days working in an approved organisation or working according to M.A.801(b)2 or a combination of both. Your understanding under the first paragraph in blue characters is correct, the 6 months period may be undertaken in one block or split in different blocks, but it is not linked to the number of certifications.

comment

72

comment by: *Monarch Aircraft Engineering Limited*

Appendix 1 – 2a2 2b2

Too many people have input into the revalidation,

Justification:
Possible variation of standards.

response

Not accepted

Options 2.a.2 and 2.b.2 were not selected as a preferred option, but only the option 1.b was selected. The group developed the rule based on this option. The group intended by 'third party': organisations as qualified entity, described in the Article 3 of Basic regulation 1592/2002.

comment

73

comment by: *Monarch Aircraft Engineering Limited*

Appendix 1 - 1c)

Would this align with Part 145 and negate the requirement for review of practical experience of six months in every 2 year period?

If a Type rating was added to a licence every year, would this mean that every year the individual is sending in a record of experience?

Justification:
This could prove a very expensive exercise in terms of cost and resources.

response *Noted*

It is not required that licence holders send every year records of experience, but only ensure the continued validity of his privilege by meeting the 6 months experience within two years. If this is not met, only the continued validity of his privileges is affected.

When a type rating is added, a form 19 shall be provided as per 66.A.10. The preferred and selected option is not in contradiction with Part-145.

resulting text Refer to the resulting text at the end of the document.

Appendix I. RIA - c. Impacts p. 11-13

comment *1* comment by: *Jorge Alves*

I work in Portugal. As the issue of Air Safety is the most important subject of all, I would suggest that EASA could implement such a Log-Book with the minimum basic administrative records necessary, as an example for the industry to follow and/or upgrade. There are already some examples around, like the one from ALAE, in England.

One may think it would be much trouble for EASA to handle, but if we consider the need for standards in the aviation business, such minimum requirements in the logbook as example, could imply less work in the future, when the need for a standard in this matter will be more visible.

response *Not accepted*

The Agency did not feel necessary to provide a standard of maintenance experience log-book. There is neither form of aircraft log-book in M.A.306 dealing with operator's technical log-book. This can be left to the initiative of the competent authority, or to maintenance organisations or to individuals, as long as they provide the details of records in this AMC to meet the requirement.

comment *28* comment by: *GLOBALIA*

It would be desirable to make clear the difference between Maintenance Licensed personnel and certifying staff.

response *Not accepted*

Please refer to answer to comment No. 27 in paragraph 8 "Appendix I. RIA - a. Purpose and intended effect".

comment *51* comment by: *European Regions Airline Association*

1b) Same as Part-66 more precision

May have minimal negative impact due to a slight increase in administrative work for AML holder in recording his experience and negligible on the NAA for amendment of the form 26 (licence) on attrition basis only.

The above paragraph speaks of a "minimal negative impact" due to a "slight" increase in administrative work.

It is the opinion of ERA that the increased burden on the AML holder will be far from minimal. Furthermore the additional burden will be faced by the NPA's already stated 100,000 certifying staff.

It is also our opinion that the NAAs will also face additional burden in verifying each and every one of these 100,000 log books every time a licence is renewed.

The Agency is requested to provide a documented safety case that supports the need for a change to this AMC, as well as a revised Regulatory Impact Assessment that more adequately addresses the additional administrative and financial burden this will place on Industry, the AML holders and the NAAs.

response *Not accepted*

The Agency had not evidence that a safety case was required as there is no change in the rule, , and there is no requirement to check the experience recency at each AML renewal, refer to the new AMC 66.B.120 created from the previous GM 66.B.120.

There is not major increase of administrative burden as any system in an organisation is acceptable.

The log-book was already recommended by AMC 66.A.45 to demonstrate the type rating experience.

comment

52

comment by: *European Regions Airline Association*

1b) Same as Part-66 with more precision:

May have small positive impact due to emphasis on experience requirements, would be a proactive action. Log-book or equivalent data required.

The above paragraph fails to demonstrate that any safety benefit will result from the change to the AMC. The words "may have a small positive impact" implies uncertainty that any safety case exists to:

- a) justify the need for the change, and
- b) that the changes suggest would reap any safety benefit

The agency is requested to provide the safety case behind this NPA.

response

Noted

The justification of the NPA was provided in the paragraph IV. "Content of the draft decision" (Explanatory note).

A safety case is not needed because the AMC to 66.A.20 was already existing. The NPA enhances and clarifies the content of the AMC.

comment

55

comment by: *AgustaWestland*

We support the option 1.a)

The directions regarding Certification Authorization for Part 145 are already restrictive enough.

Option 1.b) might be acceptable, while all the other options will represent a remarkable cost impact for the industry, considering also, the tremendous cost due to the "transition phase" from national Licenses which is still in progress.

As a general comment to this NPA, we feel that the expiration of ratings and the suspension of privileges will also have a negative impact on the Certifying Staff marketplace. As a matter of fact, the loss or limitation of ratings and privileges will be discriminatory for people working in smaller organizations, with less aircraft types to maintain and, consequently, the cost for the Industry in recruiting Technician with proper ratings will increase.

response *Noted*

Not meeting the requirement of 66.A.20(b)2 does not limit, suspend or revoke a licence nor the type ratings. As you mentioned it suspends only the privileges.

The Agency understand the commenter's concerns; however, the proposed AMC to 66.A.20(b) 2 does not affect to organisations but to individuals. Individuals holding a Part-66 license shall comply with the 6 months experience within 2 years to maintain the privileges associated to his license. The group did not identify reasons to develop different requirements for individuals working in the small organisations than those working in the large organisations.

resulting text

Refer to the resulting text at the end of the document.

Appendix I. RIA - e. Summary and final assessment

p. 13-14

comment 29

comment by: *Swiss Federal Office of Civil Aviation (FOCA)*

Concerning the NPA No 2007-04 and after evaluation of each option, Swiss FOCA can agree with the Agency to amend AMC/GM to Commission Regulation (EC) No 2042/2003 based on option 1b.

response *Noted*

resulting text

AMC 66.A.20 (b) 2 Privileges

The 6 months maintenance experience in 2 years should be understood as consisting of two elements, duration and nature of the experience. The minimum to meet the requirements for these elements may vary depending on the size and complexity of aircraft, type of operation and maintenance.

1. Duration:

Within approved maintenance organisations:

- 6 months continuous employment within the same organisation in one block period; or
- 6 months employment within the same or different organisations split into different blocks; or
- ~~100 individual days of experience accumulated in different organisations.~~

~~Outside approved organisations~~

The 6 months period can be replaced by 100 days working as certifying staff whether this is in an approved organisation or working according to M.A.801(b)2 or a combination of those.

~~The number of days may be reduced by up to 50% in certain circumstances, when agreed in advance by the authority.~~

When an independent licence holder maintains and releases aircraft according to M.A.801(b)2, the number of days may be reduced by up to 50% in certain circumstances, when agreed in advance by the competent authority. These circumstances should consider the cases where a an owner of an aircraft carries out maintenance on his own aircraft, and where a licence holder carries out maintenance on aircraft with low rate of utilisation which does not allow the licence holder to accumulate easily the required experience. This reduction should not be combined with the 20% reduction permitted when carrying technical support / engineering and /or management / planning. To avoid a long period without experience, in such case his number of working days should be spread over a minimum of 6 months period.

2. Nature of the experience:

Depending on the category of the aircraft maintenance licence, the following activities are considered relevant for maintenance experience:

- Servicing;
- Inspection;
- Operational and functional testing;
- Trouble-shooting;
- Repairing;
- Modifying;
- Changing component;
- Supervising these activities;
- Releasing aircraft to service.

For category A certifying staff, the experience should include exercising the privileges, by means of representative tasks. These tasks should be carried out on at least one of the aircraft types endorsed to which the tasks are related to on the authorisation.

For category B1 and B2, the experience should include exercising the privileges, by means of representative activities.

For every aircraft type included in the authorisation, experience should be shown on at least one comparable aircraft type of same technology, construction and systems within the same Part-66 sub-category. Aircraft are meeting the following criteria comparable if the following items are comparable of same technology, construction and systems:

- a) Propulsion (e.g. aircraft equipped with turboprops or turbopfans or turboshafts or jet engines or pushpropellers); and
- b) Engine (e.g. Fadedec/non-Fadedec/Wankel/diesel); and
- b) e) Flight controls (e.g. aircraft equipped with mechanical controls or hydraulically powered controls or electrically powered controls); and
- c) d) Avionics (e.g. aircraft equipped with analog systems or digital systems); and
- d) e) Material (e.g. aircraft manufactured from aluminium or composite or

wood) .

f) ~~Construction (e.g. bonding/ riveting/ welding).~~

~~Holder~~s of a licence endorsed with a group rating of aircraft manufactured from different material should show experience on any aircraft of the group.

For category C, the experience should include exercising the privileges held on at least one of the aircraft types endorsed on the authorisation.

For a combination of categories, the experience should include some activities of the nature shown in paragraph 2 in each category.

A maximum of 20% of the experience duration required may be replaced by the following relevant activities on a ~~comparable~~ aircraft ~~type of same technology,~~ construction and systems:

- Aircraft maintenance related training as an instructor/assessor or a student;
- Maintenance technical support/engineering;
- Maintenance management/planning.

The experience should be documented in an individual log book or ~~as database~~ any system which collects the following records: ~~kept by the approved maintenance organisation.~~ The level of detail should include the following as appropriate:

- a) Date;
- b) Aircraft type;
- c) Aircraft identification i.e. registration;
- d) ATA chapter (optional);
- e) Operation performed i.e. 100 FH check, MLG wheel change, engine oil check and complement, SB embodiment, trouble ~~shouting~~shooting, structural repair, STC embodiment...;
- f) Type of maintenance i.e. base, line;
- g) Type of activity i.e. perform, supervise, release;
- h) Category used A, B1, B2 or C.

Remark: as per article 5 of regulation 2042/2003, this experience requirement does not apply to:

- Certifying staff issuing a certificate of release of aircraft as per M.A.607(b);
- Pilot-owner certifying tasks according to M.A.803; and
- Certifying staff outside of the EU as provided for by 145.A30(j) and Appendix IV of Part-145.

~~New AMC 66.B.500~~

~~AMC 66.B.500 – Revocation, suspension or limitation of the aircraft maintenance licence.~~

~~The competent authority may require the licence holder for documentary evidence of compliance of the licence to Part 66, such as the experience requirements mentioned in 66.A.20(b). The purpose is to verify that the licence holder has been in compliance with the continued validity requirements for the privileges he has been exercising.~~

~~New AMC 66.B.120~~

AMC 66.B.120

The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation and M.A.801(b)2 certifying staff in ensuring the continued validity of the certification authorisation (145.A.35(c) or M.A.607(a)1).

In this purpose of ensuring the continued validity of certification authorisations when verifying the organisations in accordance with 145.B.30 or M.B.604, or on spot checks, the competent authority may require the licence holder for documentary evidence of compliance of the licence to Part-66, such as the experience requirements mentioned in 66.A.20(b).

I. Amendments to GM 66.B.120

~~**GM 66.B.120**~~


~~The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is not a condition for the renewal of a licence but a matter for the approved maintenance organisation and M.A.801(b)2 certifying staff in ensuring the continued validity of the certification authorisation (145.A.35(c) or M.A.607(a)1).~~

~~In this purpose of ensuring the continued validity of certification authorisations when verifying the organisations in accordance with 145.B.30 or M.B.604, or on spot checks, the competent authority may require the licence holder for documentary evidence of compliance of the licence to Part 66, such as the experience requirements mentioned in 66.A.20(b).~~

~~**GM 66.B.120**~~

~~The competent authority will not be carrying out any investigation to ensure that the licence holder is in current maintenance practice as this is a matter for the maintenance organisation approved under Part 145 in ensuring validity of the Part 145 certification authorisation.~~

Appendix A - Attachments

 [FlyerTech Ltd Response to Notice of Proposed Amendment1.pdf](#)
Attachment #1 to comment [#60](#)

 [Part 66 Aircraft Matrix.pdf](#)
Attachment #2 to comment [#19](#)

 [Part 66 Aircraft Matrix.pdf](#)
Attachment #3 to comment [#44](#)