

# Part-66

# Get a Part-66 licence

#### What are the Part-66 licence categories?

#### Answer

In a Part-145 approved organisation, the different categories of Part-66 licences are:

LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:	
A	Minor scheduled line maintenance and simple defect rectification Divided into the following subcategories:	Line	
	<ul> <li>A1 Aeroplanes Turbine;</li> <li>A2 Aeroplanes Piston;</li> <li>A3 Helicopters Turbine;</li> <li>A4 Helicopters Piston.</li> </ul>	Line Maintenance	
B1	Maintenance on aircraft structure, power plant and mechanical and electrical systems, avionic systems requiring simple tests to prove their serviceability and no troubleshooting Divided into		
	<ul><li>B1.1 for turbine aeroplanes,</li><li>B1.2 for piston engine aeroplanes,</li><li>B1.3 for Turbine helicopter and</li><li>B1.4 for piston engine helicopter</li></ul>	Maintenance	
B3	Maintenance on aeroplane structure, power plant and mechanical and electrical systems; and on avionics systems requiring only simple tests to prove their serviceability and not requiring troubleshooting limited to non-pressurized aeroplanes of 2 000 kg MTOM and below.	Line Maintenance	

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LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	Page 2 of 3 What:
B2	Maintenance performed on avionic and electrical systems and electric and avionics tasks within powerplant and mechanical systems requiring only simple test and minor scheduled line maintenance and simple defect rectification The same as B2 but limited to the systems endorsed on the licence: Divided into the following 'system ratings':	Line Maintenance
B2L	communication/navigation (com/nav), instruments, auto flight, surveillance, airframe systems.	Line Maintenance
	Maintenance on aircraft structure, power plant and mechanical and electrical systems; radio, Emergency Locator Transmitters (ELT) and transponder systems; and work on other avionics systems requiring simple tests to prove their serviceability	
	Divided into the following subcategories:	
L	L1C: composite sailplanes, L1: sailplanes, L2C: composite powered sailplanes and composite ELA1 aeroplanes, L2: powered sailplanes and ELA1 aeroplanes, L3H: hot-air balloons, L3G: gas balloons,	Line Maintenance
	L4H: hot-air airships, L4G: ELA2 gas airships, L5: gas airships other than ELA2.	
С	Base maintenance C with respect to complex motor-powered aircraft and C with respect to other than complex motor-powered aircraft	Line Maintenance
	Support staff for:	

Support staff for:

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LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:
B1	Maintenance on aircraft structure, power plant and mechanical and electrical systems, avionic systems requiring simple tests to prove their serviceability and no troubleshooting (subdivided into B1.1 for turbine aeroplanes, B1.2 for piston engine aeroplanes, B1.3 for Turbine helicopter and B1.4 for piston engine helicopter)	Base Maintenance
B2	Maintenance on avionic and electrical systems and electric and avionics tasks within power plant and mechanical systems requiring only simple test and minor scheduled line maintenance and simple defect rectification	Base Maintenance
B2L	The same as B2 but limited to the systems endorsed on the licence: • communication/navigation (com/nav), • instruments, • auto flight, • surveillance, • airframe systems.	
В3	Maintenance on aeroplane structure, power plant and mechanical and electrical systems; and on avionics systems requiring only simple tests to prove their serviceability and not requiring troubleshooting limited to non-pressurized aeroplanes of 2 000 kg MTOM and below.	Base Maintenance

LICENCE CATEGORY	For certifying the release to service of work performed on aircraft:	What:	
	Maintenance on aircraft structure, power plant and mechanical and electrical systems; radio, Emergency Locator Transmitters (ELT) and transponder systems; and work on other avionics systems requiring simple tests to prove their serviceability		
	Divided into the following subcategories:		
L	L1C: composite sailplanes, L1: sailplanes, L2C: composite powered sailplanes and composite ELA1 aeroplanes, L2: powered sailplanes and ELA1 aeroplanes, L3H: hot-air balloons, L3G: gas balloons, L4H: hot-air airships, L4G: ELA2 gas airships, L5: gas airships other than ELA2.	Base Maintenance	
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See points 66.A.3 and 66.A.20 of Annex III (Part-66) to Regulation (EU) No 1321/2014 can be found on the Agency website <a href="https://www.easa.europa.eu/regulations#regulations-continuing-airworthi...">https://www.easa.europa.eu/regulations#regulations-continuing-airworthi...</a> or in the eRules <a href="https://www.easa.europa.eu/document-library/easy-access-rules/easy-rules/easy

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https://www.easa.europa.eu/bg/faq/19017

#### How to get an EASA Part-66 Licence (Category B1 or B2)?

#### Answer

- 1. In order to get an EASA Part-66 AML (Aircraft Maintenance License), an applicant needs:
  - i. Basic knowledge (66.A.25);
  - ii. Basic experience (66.A.30).
- 2. In order to get an aircraft type rating TR endorsed in the AML, an applicant needs:
  - i. Type Training (Theoretical and Practical) (66.A.45)

ii. On-the-job Training (OJT) for the first TR (66.A.45).

The following two schemes depict the most common paths and are for information only.

• The first scheme applies to Group 1 aircraft (B1 and B2 licence categories).

• The second scheme applies to other than Group 1 aircraft (B1 and B2 licence categories). NOTE: Aircraft groups are described in 66.A.5.

These schemes do not override Part-66 requirements nor capture all the possibilities (various licences, educations and experiences). The start and end of each phase can vary depending on individual cases.

For further and detailed information:

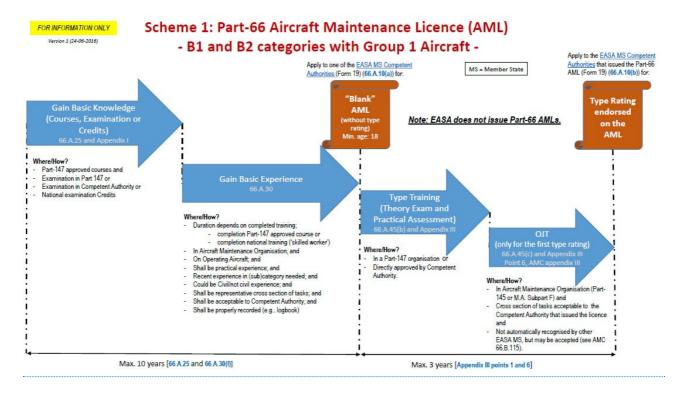
- Refer to Part-66 and related AMC/GM; and
- Consult the Competent Authority where you intend to apply for the AML.

NOTE:

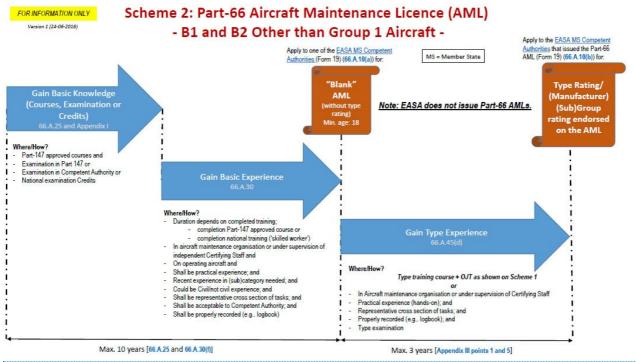
An AML issued by a country other than EASA Member States cannot be rendered valid as EASA Part-66 AML.

NOTE:

Part-66 licences issued by the countries other than EASA Member States are not mutually recognised in the European system.







Click on the pictures to zoom in.

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https://www.easa.europa.eu/bg/faq/21067

# How can I apply for an EASA Part-66 licence? What is required at the time of the application?

#### Answer

The initial application for a Part-66 aircraft maintenance licence shall be made to the competent authority of one of the Member States (MS). Please contact this competent authority for an application Form (EASA Form 19) and specific details concerning the application.

The EASA Form 19 shall be submitted to the MS together with evidence of compliance with the requirements. MS will specify the related fees and how compliance with the requirements shall be demonstrated.

See 66.A.10, 66.A.15, 66.A.25, 66.A.30, 66.A.45 and 66.A.70 and related AMC/GM.

An application for amendment or renewal of a Part-66 aircraft maintenance licence (AML) shall be made to the competent authority of the MS who issued the licence. Please contact this competent authority for an application Form (EASA Form 19) and specific details concerning the application.

The EASA Form 19 shall be submitted to the MS together with evidence of compliance with the requirements. MS will specify the related fees and how compliance with the requirements shall be demonstrated.

See 66.A.10, 66.A.15, 66.A.25, 66.A.30, 66.A.40, 66.A.45, 66.A.50, and 66.A.70 and related AMC/GM.

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#### Link:

https://www.easa.europa.eu/bg/faq/19083

# Who is allowed to issue EASA Part-66 licences? Can I apply for a Part-66 licence to EASA?

#### Answer

EASA is not a licensing authority and therefore does not issue any licences. Part-66 licences are issued by the competent authorities of the EU Member States, plus Switzerland, Norway, lceland and Liechtenstein. The list of the National Aviation Authorities and their contact details can be accessed here: https://www.easa.europa.eu/the-agency/member-states.

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13/04/2015

#### Link:

https://www.easa.europa.eu/bg/faq/19082

# I want to work in an organisation located within the EU. Do I need a Part-66 licence?

#### Answer

According to the current rules, a Part-66 licence is required for:

- certifying the release to service of maintenance of an aircraft;
- work in maintenance organisations as support staff.

For other activities within a maintenance organisation, a Part-66 licence is not required. No Part-66 licence exists for components (based on article 5 of Commission Regulation (EU) No. 2018/1142).

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14/09/2018

#### Link:

https://www.easa.europa.eu/bg/faq/19014

# I am a colour-blind. Does this prevent me from getting a Part-66 licence or exercising my licence privileges?

#### Answer

Regulation (EU) 1321/2014 does not require any medical examination before applying for a Part-66 licence.

In the past some medical criteria were proposed in JAR-66, but these were removed in order to avoid conflicts with national rules. JAR 66.A.50 had requirements on:

- use of alcohol at work,
- effects of medicines,
- physical conditions, vision, ability to see colours,
- mental conditions.

Part-66 has only a provision to suspend, limit or revoke licences in case of carrying out maintenance or issuing a certificate of release to service when adversely affected by alcohol or drugs [66.B.500 point(7)].

Current 145.A.30(e) requests certifying staff to receive a human factor training and GM 1 145.A.30 (e) gives guidance about the elements of the training to be imparted:

- 4 Human performance & limitations
- 4.1 Vision
- 4.2 Hearing
- 4.3 Information-processing
- 4.4 Attention and perception
- 4.5 Situational awareness
- 4.6 Memory
- 4.7 Claustrophobia and physical access
- 4.8 Motivation
- 4.9 Fitness/Health
- 4.10 Stress
- 4.11 Workload management

- 4.12 Fatigue
- 4.13 Alcohol, medication, drugs
- 4.14 Physical work
- 4.15 Repetitive tasks / complacency

Common sense recommends the certifying staff not to exercise the privileges of their certification authorisation if they know or suspect that their physical or mental condition renders them unfit to exercise such privileges (impact to the safe maintenance operations). In addition such recommendation may be covered and rendered mandatory by the national requirements of the Member State where you exercise your privileges. Typical examples are for intoxication (alcohol, drugs, etc.).

It is therefore recommended that you inform the management of your maintenance organisation:

- as you should not deviate from the national law;
- as the organisation shall establish and control the competence of personnel; (145.A.30(e) necessary expertise related to the job function);
- as the organisation shall have a human performance programme in place (145.A.35(e)); and
- as the ICAO safety management system encourages to identify hazards and risks.

Please find an agreement with your company in order to list the maintenance tasks that you are allowed to carry out without jeopardising the aircraft safety.

Note: The same reasoning as explained above applies for any medical condition.

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#### https://www.easa.europa.eu/bg/faq/19089

Does EASA plan to propose changes to the implementing regulation to establish specific adaptations applicable to persons with learning difficulties (e.g. dyslexia, attention deficit disorder, hyperactivity,...) who wish to undertake aircraft maintenance training in a Part-147 approved training organisation as required to apply for Part-66 licenses?

#### Answer

Anybody able to pass the basic knowledge examinations and fulfil the basic experience requirements can get the related Part-66 licence. There are no additional conditions such as a medical certificate or any other proof regarding the mental or physical abilities. In other words,

people with specific learning difficulties or physical impairments are not discriminated by Part-66 or Part-147.

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Obtaining the licence does not give the certification privileges. Before granting such privileges, the maintenance organisation will have first to check the competence, including the assessment of the skills and abilities and considering the Human Factors principles. The scope of the certification authorisation will be commensurate to these competence/abilities. Please note that in some EU Member States additional occupational safety and health requirements may apply (working on heights, confined spaces, etc.).

EASA does not plan to propose amendments to the regulations to account for cases of people with special needs during examinations: a single regulation cannot cover all individual cases. If a Member State intends to introduce any such adaptation, Regulation EU 2018/1139 (the BR) includes the possibility for the Member States to grant an exemption under the Article 71(2), after evaluation of the individual conditions for the case.

As an additional information, the Agency already issued several positive recommendations for such exemptions (e.g. for candidates with confirmed dyslexia, i.e. 25% additional time). Please contact your competent authority for details.

For further information about the flexibility provisions under the BR, please see <u>'Safeguard &</u> Flexibility Provisions'.

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### Link: https://www.easa.europa.eu/bg/faq/19090

### How can I get a Part-66 licence valid in the EU by conversion?

#### Answer

Either you are the holder of:

- a national licence [66.A.305] or an approved maintenance organisation authorisation [66.A.310], that was valid in the Member State before the entry into force of the EASA regulation introducing the relevant Part-66 categories (see entry into force of the amendments of the regulation), or
- JAR-66 licence, which will automatically be re-issued as Part-66 licences as they are deemed to have been issued in accordance with Part-66. This does only apply to JAR-66 licence issued by the countries listed on the Mutual recognition page.

Please note that none of the bilateral agreements between the EU and third countries (at present US, Canada, Brazil and China and Japan) have the maintenance licences in their scope.

Furthermore, 66.A.70 allows conversion of qualifications valid in a Member State in very specific and limited cases.

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https://www.easa.europa.eu/bg/faq/19019

## **Basic Part-66 licence (without type rating)**

For personnel studying a qualification at a University or a degree in a country outside of the EU: I am studying aeronautics and I wish to obtain an EASA Part-66 licence? May I get a credit or may I get a licence based on my degree?

#### Answer

No, unless the basic knowledge got outside of the EU is acquired in a Part-147 training organisation approved by EASA, according to 66.B.405.

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# Which documentation is required to support the application demonstrating compliance with the experience requirements?

#### Answer

Maintenance experience should be written up in a manner that the reader has a reasonable understanding of where, when and what maintenance constitutes the experience. A task-by-task account is not necessary, but at the same time a bland statement such as "X years maintenance experience completed" would not be acceptable. A maintenance log book detailing the experience is desirable and some competent authorities may require such a log

Consequently, the format used to evidence the maintenance experience is not strictly defined in the rules and is left at the discretion of the competent authority issuing the licence. Hence, EASA advises you follow the instructions of the competent authority where you intend to apply for.

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I work as a mechanic in the military field on aircraft being also certified for civil operations. In order to obtain the Part-66 licence, why do I need additional experience of civil aircraft maintenance as required by 66.A.30(e) on top of my experience in the military field?

#### Answer

As stated in 66.A.30(e), for mechanics having a military background and seeking a Part-66 licence, the objective is to ensure adequate understanding of the civil aircraft maintenance environment, not only because of possible different aircraft technologies, but also because of practices linked to the civil environment.

Not only the technology or systems of the civil aircraft might differ from the military aircraft version configuration (e.g. no video entertainment system; no sliding chutes; different fuel or electrical systems) but the experience gained in the military environment might also significantly differ from the scope of work of the civil maintenance organisation, its procedures and policies (e.g. use and meaning of the certificate of release to service - EASA Form 1, standard parts, store and tools procedures, use of the maintenance documentation such as ADs, SB, SIL..., quality and safety management system; human factor aspects, continuing airworthiness record systems...).

In addition the interaction with the customers (i.e. the airliners) induces new practices such as use of the aircraft technical log book, MEL, aircraft defect rectification and deferment of items; use of customer documentation (e.g. MPD, MRB, SRM, IPC); interaction with the crew; how to behave with the passengers; special procedure such as (re)fuelling, de-icing /anti-icing; communication with the tower or moving on the apron.

Finally, the requirements for the continuing airworthiness of the aircraft might significantly evolve in the civil environment. To name a few, the following items can be reminded: ADs, SBs,

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operational directives, EASA requirements; records and archives; repairs and modifications (use of data, EASA/FAA rules; dual-release); special inspections (e.g. CPCP, EWIS); approved maintenance programme and its effectiveness / reliability; occurrence reporting; understanding of MSG-3 methods ...

The military regulations widely differ from country to country, with certain countries having military rules similar to the EU ones, while others have very different rules. The 12-month additional civil maintenance experience average (as per AMC 66.A.30(e)), has been agreed by the Member States and accepted as a standard way to demonstrate compliance with the rule to achieve mutual recognition and adequate degree of standardisation.

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#### Link:

https://www.easa.europa.eu/bg/faq/19086

I have completed my EASA Part-66 modules for B1 and I have passed all the exams, but I still lack experience to get my licence. Is there a time limit to get the licence ? Will the certificate expire in a few years if I do not get the experience?

#### Answer

According to Commission Regulation (EU) No 1149/2011 of 21 October 2011 (amending Regulation (EC) No 2042/2003), the basic examinations shall be passed and experience shall be acquired within the ten years preceding the application for an aircraft basic licence. The new regulation also states that for the purpose of time limits related to basic knowledge examinations, basic experience acquired before the Regulation applies, the origin of time shall be the date by which this Regulation applies, which is 01/08/2012 (which means until 31/07/2022).

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# **Categories of a Part-66 licence**

I hold a Category A1 Part-66 licence. What are the requirements to extend

#### my licence to Category B1.1?

#### Answer

The requirements to extend a Part-66 licence with a category A1 to B1.1 are:

- the knowledge demonstration of those basic modules, which are of higher level for B1.1 (see Part-66 Appendix I); and
- the demonstration of experience required by Appendix IV to Part-66:

Two years of practical maintenance experience on operating aircraft in the B1.1 category (not in the A1 category) is needed before applying for the extension. This experience need to be accumulated within the 10 years preceding the application.

The experience requirement will be reduced by 50% if the applicant has completed an approved Part-147 course relevant to the category extension according to Appendix IV of Part-66.

See 66.A.10, 66.A.25, 66.A.30 and related AMC/GM.

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# I already hold a Part-66 licence and I would like to include an additional basic (sub)category? Which additional (sub)modules are required to be passed for the addition of that new (sub)category?

#### Answer

According to 66.B.100(b), the competent authority shall verify that all required modules of Appendix I or Appendix VII to Part-66 related to that new (sub)category sought are met. Credit can be granted as regards to the basic knowledge of the (sub)category for which the licence has been already issued.

This means that a comparison of the basic knowledge (gap analysis) will have to be done between the different (sub)categories. Such a comparison has not been yet done once and for all in Commission Regulation (EU) No 1321/2014 due to the different potential cases (wide diversity of (sub)categories).

Therefore, such a comparison should be done by the Member State that has already issued the

Part-66 licence before the applicant is enrolled in such a "gap" basic knowledge course.

Please contact your competent authority, which may have already performed this comparison. Some competent authorities may have already posted such comparison(s) on their websites; however, to be sure that the comparison relevant to your case is acceptable to the competent authority who issued your licence.

In addition, the applicant will have to comply with the additional experience requirements for the new (sub)category sought, as detailed in Appendix IV to Part-66.

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### Type ratings of a Part-66 licence

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

#### Answer

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

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

Regarding Part-66 Appendix III, point 5., "Type Examination Standard" does not apply to the

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

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

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#### Link:

https://www.easa.europa.eu/bg/faq/19094

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

#### Answer

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

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

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Link:

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

#### Answer

If aircraft types of the same manufacturer have different type ratings as stated in Appendix I to AMC to Part-66, there is a gap of knowledge gap preventing the endorsement of the second aircraft type. E.g. the Airbus A330 (GE CF6) is a different rating to the Airbus A318/A319/A320/A321 (CFM56).

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

- a complete theoretical + practical Airbus A330 (GE CF6) course, or
- a differences training course, theoretical and practical for Airbus A330 (GE CF6) compared to Airbus A318 (CFM56) (and/or A319/A320/A321) as described in Appendix III point 1(c). Those training courses may either be provided by a Part-147 training organisation or by the competent authority.

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

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#### Link: https://www.easa.europa.eu/bg/faq/19030

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

#### Answer

As per the new Regulation (EC) No. 1149/2011, the practical element of training is no longer a

question of time. The duration of the practical training should be adequate in order to complete the contents required by paragraph 3.2 of Appendix III to Part-66.

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

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

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

#### Answer

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

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

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

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

#### Answer

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

- This is a one-time approval on a case-by-case basis for a single course or a predefined group of courses i.e. Part-145 approved maintenance organisation cannot receive a permanent approval for aircraft type training.
- The course and the assessment comply with the same standard valid for approved Part-147 organisations; this standard is described in paragraph 1 to 4 of Appendix III to Part-66.
- No Part-147 Certificate of Recognition can be issued for the purpose of the mutual recognition between Member States. However, an appropriate training certificates can be issued after successful completion of both elements.

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

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

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

#### Answer

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

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

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

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

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# OJT (On the Job Training) for a Part-66 licence

What is the intention of the requirement regarding the assessment of the OJT. What is the nature of the assessment for an OJT? What are the differences between practical assessment and OJT assessment? What are the objectives of the OJT assessment?

#### Answer

The practical assessment addresses the practical portion of any type training whereas the OJT assessment addresses the additional practical experience necessary to gain in a true maintenance environment as part of the first type rating in a (sub)category, as illustrated by the table below:

#### PRACTICAL ASSESSMENT

OJT ASSESSMENT For the purpose of 66.A.45(c) What/who is Candidates following practical element Completeness of the OJT. assessed: of training.

> Reference: 66.A.45 (a)&(b); Appendix III, Reference: 66.A.45 (c); Appendix III, section 6; AMC to Section 6 of Appendix 4.2.; AMC Appendix III  $\parallel \parallel$

Function of To perform the final evaluation of the knowledge, skills and attitude of the assessor: trainee following the practical element of candidate's competence is indirectly the type training

> Reference: Appendix III 4.2.; AMC Appendix III

Organisation • Part-147

Approved maintenance environment

To conduct the final assessment of the completed OJT, whereas the justified.

Reference: Appendix III, 6.; AMC to Section 6 of Appendix III 8.

Always in a maintenance organisation approved under Part-145 with an aircraft rating

- :
- (Part-145, M.A. Subpart F with A rating, manufacturer) under the Part-147 approval Defined maintenance environment as
- described in the direct approved procedure by the competent authority (66.B.130)

Reference: Appendix III 1(b)

Objectives: To evaluate if the candidate has gained the required competence in performing safe maintenance, inspections and routine work according to the aircraft documentation and other relevant instructions and tasks as appropriate for the type of aircraft.

Reference: Appendix III, 3.2.

Reference: Appendix III 6.; AMC to Section 6 of Appendix III 1.

To confirm the completion of the required diversity and quantity of OJT, based on the supervisor(s) reports and feedback. It is sufficient that the completion of individual OJT tasks is confirmed by the direct supervisor(s), without being necessary the direct evaluation of the assessor.

Reference: AMC to Section 6 of Appendix III 7. & 8.

Type of assessmen	The assessment may be: t: • diagnostic (prior to a course), • formative • summative (partial or final evaluation) • performed task-by-task • performed as a group of tasks • partly executed on simulation devices • performed as a final assessment <i>Reference: AMC to Part-66 Appendix III</i> <i>2</i> )	<ul> <li>Page 22 of 32</li> <li>Continuous during OJT (confirmed by the direct supervisor)</li> <li>Summative, as a final evaluation of the completeness of the OJT (based on the supervisor(s) reports and feedback)</li> </ul>
Qualification of the assessor:	n The assessment shall be performed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process being undertaken and be authorised to d so by the organisation. Guidance about the qualification is given in AMC to Part- 66 Appendix III 3.)	The OJT shall be assessed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process obeing undertaken and be authorised to do so by the organisation. Guidance about the qualification is given in AMC to Part-66 Appendix III 3.)
	Reference: Appendix III 4.2.; AMC to Part-66 Appendix III 3.)	Reference: Appendix III 6.; AMC to Part-66 Appendix III 3.)
Procedure included in:	Part-147 MTOE	Part-145 Maintenance organisation exposition (chapter 3.15) or "one-off" direct approval
	Reference: Appendix III 1(b); Part-147	Reference: AMC 145.A.70 (a)

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(OJT) What is the meaning of the following statement in Part-66 Appendix III, Section 6: "The final assessment of the completed OJT is mandatory and..."?

#### Answer

The **completeness** of the whole OJT process shall be assessed. The intent of the requirement is not to suggest that:

- there should be an assessment performed by the assessor on top of every task monitored by the supervisor; and/or
- at the very end of the OJT programme, there should be a comprehensive hands-on assessment of the candidate on a real aircraft as an additional and ultimate evaluation
   All report(s) or feedback from the supervisor(s) having monitored every actual job task performance or any other source of information (use of manuals and procedures; observance of safety measures, warnings and recommendations; adequate behaviour in the maintenance environment), the designated assessor should be in a position to:
- ensure that the OJT procedure was fully met (in terms of objective and content); and
- check that the competence of the candidate was positively assessed.

In case of doubt, the assessor may decide to proceed him/herself to an additional evaluation of the candidate or perform a gap analysis when the OJT procedure is not fully met such as an insufficient number of tasks or diversity of tasks or unclear supervisor's report regarding the candidate's performance. The supervisor should not sign the actual task if the person did not achieve the required competence in safe task performance.

Note: It is worth being reminded here that OJT addresses:

- the first type rating in a (sub)category of aircraft; and
- subsequently addresses young mechanics (e.g. "newcomers") or mechanics having no experience in that new (sub)category of aircraft (e.g. extension of the license).

AMC to Section 6. of Appendix III to Part-66 gives more clarification about the assessment process and the function of the assessor:

- "It is sufficient that the completion of individual OJT tasks is confirmed by the direct supervisor(s), without being necessary the direct evaluation of the assessor", and
- "The function of the assessor, as described in Section 6 of Appendix III to Part-66, is to conduct the **final assessment of the completed OJT**. This assessment should include confirmation of the completion of the required diversity and quantity of OJT and should be based on the supervisor(s) reports and feedback".

It is left to the decision of the competent authority how to comply with this requirement: the AMC as suggested by the Agency aims at avoiding additional burden, duplication or overregulation while proposing a simple final evaluation process.

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# Tasks listed in Appendix II of Part-66 for an OJT are not suited to large aircraft. Shall we select the OJT tasks only from this list?

#### Answer

Not only, because it is required that:

- the tasks for an OJT must be representative of the aircraft: this means that the tasks listed in Appendix II which are representative of the aircraft or another model in the type rating should be kept and those not representative be disregarded,
- some tasks should be selected from each paragraph of the Appendix II list: this means that it is not necessary to perform exactly 50% in each ATA chapter,
- new tasks more representative of the type of aircraft may be added by the maintenance organisation,
- the OJT tasks should be selected because of their frequency, safety, novelty: tasks selected among those frequently carried out by the organisation on this type or more related to safety should be deleted.

Note: See AMC to Section 6 of Appendix III to Part-66 point 4 and 5

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#### How tasks for OJT shall be selected for different licences?

#### Answer

The AMC states that the tasks are representative of the licence (sub)category applied for. This means that:

- the tasks should identify whether they relate to a B1.1, B1.3 licence ..., to a B2 or L5,
- and be adapted to the privilege of each licence category / subcategory as defined in 66.A.20(a):
  - for a B1 licence: aircraft structure, power plant and mechanical and electrical systems + work on avionics system with simple test but not including trouble shooting;
  - and those related to a B2: avionics, aircraft electrical system tasks and avionics/electrical

tasks within mechanical and power plant systems; or

 and those related to a L5: aircraft structure, power plant, mechanical and electrical systems, radio, Emergency Locator Transmitters (ELT), transponder systems and other avionics systems requiring simple tests to prove their serviceability.

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# Since the OJT is intended for the first aircraft type endorsement within a given licence (sub)category, does this mean that it can be performed on different aircraft types typical for that (sub)category?

#### Answer

OJT shall be performed on the aircraft type for which the applicant is seeking type endorsement. The objective of the OJT is to gain the required competence and experience in performing safe maintenance **on that particular aircraft type**.

However, a certain number of tasks may be performed on other aircraft type(s) (typically from the same manufacturer), only in the cases where such tasks are very similar to the tasks applicable to the aircraft type for which the candidate seeks the type endorsement. The AMC to section 6. of Appendix III to Part-66 states: "Tasks should be selected among those applicable to type of aircraft and licence (sub)category applied for." Tasks applicable to the aircraft type may be found also on other aircraft types, perhaps not many, but some may fulfil the requirement. A good example would be same engine types installed on different aircraft types (i.e. CFM56 installed on A320 Family and B737). The location of LRUs, oil servicing, IDG, generator, filter change, engine standard practices, etc., those tasks often do not depend on the specific aircraft type (even could be performed off-wing or on spare engine), except the tasks belonging to the airframe - engine interface. The similar can also be applied for the same type of APU installed on different aircraft types or a limited number of other components/systems. Consequently, this may be acceptable, if properly justified to the competent authority within the MOE Chapter 3.15. This flexibility provision is applicable for a limited number of tasks and should not be used to conduct the entire OJT on other aircraft type(s) showing similarities.

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#### What should be the content of the OJT procedure in MOE chapter 3.15?

#### Answer

As agreed during the Standardisation Meeting with the competent authorities, as a minimum, the OJT procedure should describe the following elements:

- Content of the OJT: the list of tasks that should be performed during the OJT or a list of generic tasks and the process how to develop a list of particular tasks out of this list of generic tasks,
- Qualifications of the assessor and supervisors performing the OJT,
- OJT logbook/worksheets format and content,
- OJT compliance report format and content,
- Production planning for the implementation of OJT (how to plan the tasks),
- Supervision process and the assessment process, what to do if the assessment is not positive,
- Safe release to service of the aircraft after OJT.

Note: AMC to Section 6. of Appendix III to Part-66 should be used when defining the content of the procedure.

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I work in a maintenance organisation approved by the competent authority of a country different from the one who issued my Part-66 licence. An OJT programme via MOE chapter 3.15 has been approved by the competent authority of my maintenance organisation. However, my licensing authority refuses to accept the OJT from the organisation I'm working for. Why? What shall I do?

#### Answer

Please review the extracted requirements here below from Part-66 Appendix III, Section 6:

• 'On-the-Job Training (OJT) shall be approved by the competent authority who has

#### issued the licence.'

- 'It shall be conducted at and under the control of a maintenance organisation appropriately approved for the maintenance of the **particular aircraft type**'.
- 'OJT shall cover a cross section of tasks acceptable to the competent authority'.
- 'In order to facilitate the verification by the competent authority, demonstration of the OJT shall consist of:
  - detailed worksheets/logbook and

• (ii) a compliance report demonstrating how the OJT meets the requirement of this Part.' Since the procedure in MOE is approved by the competent authority of the maintenance organisation, it can only be used when the licensing authority is the same as the competent authority of the maintenance organisation. In other cases, the licensing authority may accept such OJT after assessing and approving the programme, **which should usually be done prior to starting the OJT**. This is described in AMC 66.B.115 point (c) states that "in the case where the licensing competent authority is different from the competent authority of the maintenance organisation which provides the OJT, **your licensing authority may take into consideration the fact that the maintenance organisation has the OJT programme already accepted by their own competent authority** (through chapter 3.15 of the MOE, as described in AMC 145.A.70(a))".

Since your competent authority is responsible for the issue and extension of your licence, please follow the instruction of your competent authority and try to find a solution based on the above AMC.

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### How can I carry out my OJT in a Part-145 approved maintenance organisation (AMO) whose principal place of business is located outside the EASA Member States?

#### Answer

The endorsement of the first aircraft type rating, within a given category/sub-category, requires satisfactory completion of the corresponding On-the-Job-Training (ref. 66.A.45(c)).

The OJT shall be approved by the competent authority who has issued the licence(ref. Part 66, Appendix III, sec. 6).

It shall be carried out in a maintenance organisation approved under Part-145 with A rating or and the procedures for OJT should be included in the exposition (MOE chapter 3.15 "OJT procedure", approved by the competent authority of the maintenance organisation. However, since these procedures are approved by the competent authority of the maintenance organisation, and providing training is not one of the privileges of a maintenance organisation, they can only be used when the licensing authority (competent authority issuing the license) is the same as the competent authority of the maintenance organisation. In other cases, it is up to the licensing authority to decide whether it accepts such procedures for the purpose of approving the OJT (ref. AMC to Section 6 of Appendix III to Part-66).

For the Part-145, whose principal place of business is located outside the EASA Member states, the competent authority of the maintenance organisation is EASA. In such case, the OJT procedures cannot be included in the MOE, due to the fact that EASA is not a licensing authority.

The possibility still exists in this case that a licensing authority may directly approve OJT procedures, which have to be included in a separate document outside (and not being part) of the MOE.

Consequently, personnel working in these AMOs, or the AMOs wishing to support its staff on this matter, should:

- Option A: apply directly to the licensing authority who has issued the license for the approval of an OJT (to be proposed in a document outside the MOE). This option should normally be considered by organisations and not by individuals.
- Option B: find an agreement to follow an already approved OJT at another organisation, which was approved by the same licensing authority who has issued the license. Possibility also exists to follow an OJT which was approved by any other licensing authority, however in such a case the final acceptance of this OJT for the purpose of endorsing the first type rating in the license remains at the sole discretion of the competent authority issuing the license.
   It is recommended that prior to starting any OJT, the licensing authority who has issued the license is contacted to verify its acceptance of any possible intended option.

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### **Privileges of a Part-66 licence**

I am the holder of a B1.2 licence (i.e "aeroplane piston"). Can I exercise my

# privileges for piston-engine non-pressurised aeroplanes1 of 2000 kg MTOM and below (i.e. category B3)?

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#### Answer

By default, a category B3 licence is included in a category B1.2 licence because the basic knowledge requirements (66.A.25(a)) and the basic experience requirement (66.A.30) for a B3 licence are covered by the similar requirements of a B1.2 licence.

Provided that the qualification requirements are fulfilled, the B1.2 licence holder can release maintenance tasks performed on piston-engine non-pressurised aeroplanes of 2000 kg MTOM and below.

In particular the B1.2 licence holder would have to meet 66.A.20(b), which means that:

- the applicable requirements of Part-M, Part-ML, Part-145 and/or Part-CAO will be complied; and
- in the preceding two-year period he/she has 6 months of maintenance experience in accordance with the privileges granted by the aircraft maintenance licence or; met the provision for the issue of the appropriate privileges; and
- he/she has the adequate competence to certify maintenance on the corresponding aircraft; and
- he/she is able to read, write and communicate to an understandable level in the language(s) in which the technical documentation and procedures necessary to support the issue of the certificate of release to service are written.

AMC 66.A.20(b)(2) and GM 66.A.20(b)2 gives further explanations on the 6-months maintenance experience in the last 2 years, including **demonstration of experience on at** 

#### least one aircraft type per aircraft structure (metal, composite or wood).<sup>1</sup>

<sup>1</sup> - "Aeroplane" does not include "helicopter".

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# Can I have endorsed in my Part-66 licence aircraft types for which the Basic Regulation is not applicable?

Answer

The competent authority of the Member State issuing the licence may include in the Annex (Section XIV) of EASA Form 26 types for which the Basic Regulation is not applicable. The privileges endorsed for these types are based only on the national rules. The use of Section XIV of EASA Form 26 is optional.

EASA does not have any information about these types. If you want to get information about them, please contact the competent authority.

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Point 66.A.20(b)(2) requires in the preceding 2 years, 6 months of experience or to meet the provisions for the issue of the appropriate privileges. What does it mean? Does it affect the validity of the Part-66 licence?

#### Answer

The "validity" of the Part-66 licence is not affected by point 66.A.20(b)(2). The licence itself remains valid 5 years from the last renewal.

Nevertheless, compliance with point 66.A.20(b)(2) is required to ensure that the maintenance privileges are exercised by certifying staff that hold sufficient recent experience.

If you do not meet this point anymore, you lose your rights to exercise your privileges of certifying staff or support staff.

Therefore, as holder of an aircraft maintenance licence, to exercise your certification privilege in accordance with 66.A.20(b)(2), please ensure:

• You have accumulated 6 months of experience in the previous 2 years;

Note: see also AMC 66.A.20(b)(2) for possible reductions of experience, in particular for independent certifying staff. Demonstration of experience should be made on the particular or similar aircraft. Guidance on 'similar' aircraft is also provided in AMC 66.A.20(b)(2).

or

• You can demonstrate that in the last 2 years, you have met the provisions for the issue of appropriate privileges, which means (refer to 66.A.45), as applicable to the case:

1) going to a type-training course again (the need for OJT has to be assessed on case-bycase basis);

or

2) when the aircraft endorsement does not require type training (aircraft belonging in Group 2, 3 or 4):

a) pass a type evaluation, including practical assessment;

#### or

b) when no type evaluation is required for aircraft endorsement, for example:

- a B2/B2L license endorsed with a full group 3 or 4 rating; or
- for L-category licences (other than L5),

being able to demonstrate, in the last 2 years, practical experience, which shall include a representative cross section of maintenance activities relevant to the licence subcategory (B2/B2L, L1, L1C, L2, etc.)

Note: "A representative cross section of maintenance activities" means representative crosssection of the tasks listed in Appendix II to AMC to Annex III (Part-66) "Aircraft Type Practical Experience and On-the-Job Training - List of Tasks". "Demonstrate" means having a record thereof, such as a logbook.

Note: GM 66.A.20(b)2 will be reviewed and amended according to this interpretation through rulemaking task RMT.0735.

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# As a category A certifying staff at line, can my authority allow me to carry out more tasks than those specified in AMC 145.A.30(g)?

#### Answer

The list of typical tasks to be carried out by a category A certifying staff at the line shown in the AMC include a (r) stating: "Any other task agreed by the competent authority as a simple task for a particular aircraft type. This may include defect deferment when all the following conditions are met:

- there is no need for troubleshooting; and
- the task is in the MEL, and
- the maintenance action required by the MEL is agreed by the competent authority to be simple.

When these conditions are met, your authority may allow other tasks to be carried out under

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