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NPA 2023-10 - Review Part-147

RMT.0544 – Review of Part-147

NPA 2023-10

P&CA TeB
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Airworthiness Standards and Implementation
Maintenance and Production

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Your safety is our mission.



Review of Part-147

- RMT started on 14 August 2019
- NPA published 04 December 2023
- NPA commenting period end on 04 March 2024
- Opinion planned for Q1 2025

RMT.0544 – ‘Review of Part-147’ Objectives

Specific objectives

Fraud prevention, as well as other issues stemming from the EASA survey carried out in 2016-2017, were identified as objectives of the RMT:

- Eliminate or reduce the examination cheating and fraud within Part-147 organisations
- Ensure that students correctly understand the subjects taught during the training in terms of language used
- Enhance the consistency and improve the structure and readability of the Part-147

Background on fraud in maintenance

- The main topic addressed in this RMT is fraud in maintenance training organisations (MTO)
- Fraud is a well-known issue that was subject to other measures in the past i.e. RMT.0697
- The measures taken were to give the CAs more control over examinations in ‘unapproved’ locations, but were not effective
- MTOs that apply ‘examination only’ business models, particularly in ‘unapproved’ location outside the MSs, have been identified as being more prone to fraud and as the main source for this issue

RMT.0544 – ‘Review of Part-147’ Changes

MANAGEMENT SYSTEM – 147.A.110

Scope
147.A.05

Application for an organisation certificate 147.A.15	Personnel requirements 147.A.105	Examination process 147.A.135	Findings and observations 147.A.160	BK practical assessment 147.A.210
Terms of approval and scope of work 147.A.20	Record-keeping 147.A.125	Maintenance Training Organisation Exposition (MTOE) 147.A.140	Means of compliance 147.A.180	Aircraft type training 147.A.300
Subcontracting 147.A.25	Training procedures 147.A.130	Privileges of the organisation 147.A.145	Basic training 147.A.200	Aircraft type evaluation 147.A.400
Facility requirements 147.A.100	Performance of training activities 147.A.132	Changes to the organisation 147.A.150	BK theoretical examination 147.A.205	Aircraft task training 147.A.500

SECTION B – AUTHORITY
REQUIREMENTS

RMT.0544 – Management System

145.A.200 Management system

Regulation (EU) 2021/1963

- (a) The organisation shall establish, implement and maintain a management system that includes:
- (1) clearly defined accountability and lines of responsibility throughout the organisation, including a direct safety accountability of the accountable manager;
 - (2) a description of the overall philosophies and principles of the organisation with regard to safety ("the safety policy"), and the related safety objectives;
 - (3) the identification of aviation safety hazards entailed by the activities of the organisation, their evaluation and the management of the associated risks, including taking actions to mitigate the risks and verify their effectiveness;
 - (4) maintaining personnel trained and competent to perform their tasks;
 - (5) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending that documentation;
 - (6) a function to monitor the compliance of the organisation with the relevant requirements. Compliance monitoring shall include a feedback system of findings to the accountable manager to ensure the effective implementation of corrective actions as necessary.

Part-147 management system is similar to the management system of the other annexes

Part-147 management system does not include SMS elements

The following aspects are different:

Safety policy → Management policy

Safety objectives →

Management objectives

Risk management → Fraud management

147.A.110 Management system Records of instructors, examiners and assessors

(a) The organisation shall maintain a record of all instructors, knowledge examiners and practical assessors. These records shall reflect the experience and qualification, training history and any subsequent training undertaken.

(b) Terms of reference shall be drawn up for all instructors, knowledge examiners and practical assessors.

(a) The organisation shall establish and maintain a management system, including as a minimum:

(1) clearly defined accountability and lines of responsibility throughout the organisation, including a direct accountability of the accountable manager;

(2) a description of the overall philosophies and principles of the organisation with regard to management ("the management policy"), and the related objectives;

(3) maintaining personnel trained and competent to perform their tasks;

(4) documentation of all management system key processes, including a process for making personnel aware of their responsibilities and the procedure for amending that documentation;



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European Union Aviation Safety Agency

NPA 2023-10 (B)

Proposed amendments



Easy Access Rules for Continuing Airworthiness
(Regulation (EU) No 1321/2014)

Annex II (Part-145)
SECTION A — TECHNICAL AND
ORGANISATION REQUIREMENTS

- (b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities, taking into account the hazards and the associated risks inherent in those activities.
- (c) If the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139, the management system may be integrated with that required under the additional certificate(s) held.

MEASURES

Replacing Quality System requirements and expanding further into Management System

BENEFITS

- ✓ Establishing of lines of responsibility and duties of personnel
- ✓ Managing training activities more effectively
- ✓ Robust system

(5) a function to monitor the compliance of the organisation with the relevant requirements. Compliance monitoring shall include an independent auditing and a feedback system of findings to the accountable manager to ensure the effective implementation of corrective actions as necessary;

(6) a reporting scheme to enable the collection of, evaluation of, and acting upon the voluntary or mandatory reports of fraudulent actions or any other violations of the organisation procedures undertaken within the training activities.

(b) The management system shall correspond to the size of the organisation and the nature and complexity of its activities and shall ensure an effective delivery of training activities.

(c) If the organisation holds one or more additional organisation certificates within the scope of Regulation (EU) 2018/1139, the management system may be integrated with that required under the additional certificate(s) held, subject to the approval of the competent authority.



RMT.0544 – Personnel requirements – Competency assessment

147.A.105 Personnel requirements

The organisation shall establish, control, and assess the competency of the personnel involved in any training activities and compliance activities in accordance with a procedure and to a standard agreed with the competent authority. In addition to the necessary expertise related to the job function, the competency of the personnel shall include an understanding of the organisation's procedures, training principles and techniques, training methods and tools, language in which a particular training activity is carried out, as appropriate to their function and responsibilities in the organisation.

 **KEY TAKEAWAYS**

- Introduction of competency assessment requirements

GM1 147.A.105(i) Personnel requirements

COMPETENCY ASSESSMENT ELEMENTS

The following non exhaustive table may be used in the determination of the elements required for competency assessment. It is expected that organisation will adapt competency assessment elements to the organisation's nature, scope of work, size, and complexity, and to the role and responsibilities of the category of personnel.

AMC3 147.A.105(i) Personnel requirements

COMPETENCY ASSESSMENT PROCEDURE

(a) The organisation should develop a procedure that describes the process for conducting competency assessments of personnel. The procedure should specify:

	Training personnel					Compliance personnel
	Managers	Theoretical element instructors	Examiners	Practical element instructors	Assessors	
Managerial expertise and leadership skills	X	-	-	-	-	-
Resources management and production planning skills	X	-	-	-	-	-

RMT.0544 – Personnel requirements - Language

147.A.105 Personnel requirements

The organisation shall establish, control, and assess the competency of the personnel involved in any training activities and compliance activities in accordance with a procedure and to a standard agreed with the competent authority. In addition to the necessary expertise related to the job function, the competency of the personnel shall include an understanding of the organisation's procedures, training principles and techniques, training methods and tools, language in which a particular training activity is carried out, as appropriate to their function and responsibilities in the organisation.



AMC1 147.A.105(i) Personnel requirements

REQUIREMENTS FOR TRAINING PERSONNEL

(a) The qualifications and competencies of training personnel, i.e. instructors, examiners, and assessors, should be established in accordance with the following:

(2) Specific requirements

- (i) working knowledge of training technologies applied within the organisation;
- (ii) working knowledge of training methods and tools described in AMC 147.A.130(a);
- (iii) proficiency (CEFR Level C1 or equivalent) in the language of the organisation, and of the training topic and materials;



KEY TAKEAWAYS

- Introduction of language requirements for management, training, and compliance personnel



AMC1 147.A.105(e) Personnel requirements

KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

(a) The person or persons to be nominated in accordance with points (b) and (c) of point 147.A.105 should have:

- (8) proficiency (CEFR Level C1 or equivalent) in the language of the organisation, and of the training topic and materials, and adequate communication skills;

RMT.0544 – Personnel requirements – Personnel authorisation

147.A.105 Personnel requirements

- (l) The organisation shall issue training personnel with a personnel authorisation which specifies the scope of the training activities, and the fact that such personnel may only carry out training activities within the limitations stated in such authorisation.

Such training authorisation shall be issued under the responsibility of the compliance manager referred to in point (c), after compliance with points (i), (j), and (k) has been ensured. The authorisation shall remain valid subject to the organisation remaining in compliance with points (i), (j), and (k).



147.A.125 Records-keeping

- (a) The organisation shall retain the following records:

- (3) Personnel records

- (ii) The organisation shall retain all the records that are necessary to demonstrate that training personnel comply with the requirements for the issue of the training authorisation including the following elements:

- (A) records of commencement and finalisation of employment;

- (B) records of the qualifications, training, and experience;

- (C) records of personnel evaluations and authorisations;

- (D) records of the training activities carried out within the organisation;

- (E) records of reports referred to in point 147.A.110(a)(6).



KEY TAKEAWAYS

- Introduction of personnel authorisation requirements

RMT.0544 – Personnel requirements – Management structure

147.A.105 Personnel requirements

- (b) The accountable manager shall nominate a person or group of persons representing the management structure for the training functions and with the responsibility to ensure that the organisation works in accordance with the exposition and approved procedures.
- (c) The accountable manager shall nominate a compliance manager with the responsibility to monitor the compliance of the organisation and ensure compliance of the management system of the organisation.

AMC1 147.A.105(e) Personnel requirements

KNOWLEDGE, BACKGROUND AND EXPERIENCE OF NOMINATED PERSON(S)

- (a) The person or persons to be nominated in accordance with points (b) and (c) of point 147.A.105 should have:
 - (1) practical experience and expertise in the aircraft maintenance activities and aircraft maintenance training activities;
 - (2) knowledge of:
 - (i) human factors principles;
 - (ii) EU management system requirements and their application;



KEY TAKEAWAYS

- Management structure requirement
- Management responsibilities
- Management position requirements

AMC1 147.A.105(b);(c) Personnel requirements

MANAGEMENT STRUCTURE

- (c) Dependent upon the extent of approval, the organisation structure should normally include a training manager, an examination manager, and a compliance manager, all of whom should report to the accountable manager except in a small Part-147 organisation where any one manager may also be the accountable manager, as determined by the competent authority.
- (1) The training manager is responsible for ensuring that training is delivered in accordance with the training material and TNA, and to the standards specified in Part-66 and in accordance with the organisation's procedures. The training manager is also responsible for training-related corrective actions resulting from the compliance monitoring activities under point 147.A.110.
- (2) The examination manager is responsible for ensuring that all examinations and assessments are carried out to the standards specified in Part-66 and in accordance with the organisation's procedures. The examination manager is also responsible for examination and assessment-related corrective actions resulting from the compliance monitoring activities under point 147.A.110.
- (3) The compliance manager is responsible for ensuring that the organisation is in compliance with the applicable requirements of this Regulation and any additional requirements as established by the organisation, and that all activities are carried out properly under the supervision of the nominated persons referred to in point 147.A.105(b).

RMT.0544 – Personnel requirements – Training and compliance personnel

147.A.105 Personnel requirements

The organisation shall establish, control, and assess the competency of the personnel involved in any training activities and compliance activities in accordance with a procedure and to a standard agreed with the competent authority. In addition to the necessary expertise related to the job function, the competency of the personnel shall include an understanding of the organisation's procedures, training principles and techniques, training methods and tools, language in which a particular training activity is carried out, as appropriate to their function and responsibilities in the organisation.

AMC2 147.A.105(i) Personnel requirements

(b) In addition to those requirements, compliance personnel should also:

- (1) meet the specific requirements under point (a)(2) of AMC1 147.A.105(i);
- (2) have knowledge of auditing techniques, quality standards, and any other relevant standard or requirement applicable to the organisation.



KEY TAKEAWAYS

- Training personnel requirements (4 categories)
- Compliance personnel requirements (same as for training personnel + other specific requirements)

AMC1 147.A.105(i) Personnel requirements

REQUIREMENTS FOR TRAINING PERSONNEL

(a) The qualifications and competencies of training personnel, i.e. instructors, examiners, and assessors, should be established in accordance with the following:

(1) General requirements

- (i) qualified to provide secondary education level training; or
- (ii) completed training of at least 30 hours in pedagogical or andragogical training; or
- (iii) equivalent qualification to points (i) or (ii), as assessed by the training manager or the examination manager of the organisation, as applicable, and accepted by the competent authority;
- (iv) general knowledge of Part-66 and Part-147;
- (v) professional integrity, responsible attitude, and ethical approach towards training activities.

(2) Specific requirements

- (i) working knowledge of training technologies applied within the organisation;
- (ii) working knowledge of training methods and tools described in AMC 147.A.130(a);
- (iii) proficiency (CEFR Level C1 or equivalent) in the language of the organisation, and of the training topic and materials;
- (iv) working knowledge of the organisation's procedures, as relevant to the function.

RMT.0544 – ‘Review of Part-147’ Record-keeping

147.A.125 Record-keeping

(a) The organisation shall retain the following records:

(1) Training records

(i) The organisation shall retain all the records that are necessary to prove that all the requirements have been met for the issue of the certificate of recognition.

The organisation shall record the details of the training activity that is carried out within its scope of work including the following elements:

- (A) the location(s) where the training activities are conducted;
- (B) the nature and content of the training activities that are conducted;
- (C) the dates of commencement and finalisation, and the duration in hours, of the training activities;
- (D) the lists of attendees, their attendance data, and results of examinations, assessments, and evaluations, as applicable;
- (E) the list of instructors, examiners, and assessors, as applicable, and their role in the training activities that are conducted;
- (F) the delivery method e.g. classroom or distance learning;
- (G) any deviation from the planning of the activity and any event related to fraudulent actions;
- (H) subcontractor issued documents;
- (I) certificate(s) of recognition issued as a result of the training activities.



KEY TAKEAWAYS

- More comprehensive requirements
- Decrease of retention period from ‘unlimited’ to 10 years for training records
- CA access to records

(ii) The organisation shall provide the certificate(s) of recognition to the customer, and if different, to the person concerned.

(iii) The organisation shall retain the records under point (a)(1)(i) for a minimum period of 10 years from the date of issue of the certificate of recognition.

(iv) If the organisation ceases its operation, it shall transfer all the retained training records to the competent authority, in a form and manner specified by the competent authority.

(b) The organisation shall establish a record-keeping system that allows adequate storage and reliable traceability of all its activities.

(c) The records shall be stored in a manner that ensures that they are protected from factors such as damage, alteration, and theft.

(d) The format of the records shall be specified in the organisation’s procedures.

(e) The competent authority shall be granted access to personnel records.

RMT.0544 – Training procedures – Contract or agreement

147.A.130 Training procedures and quality system

- (a) The organisation shall establish procedures ~~acceptable to the competent authority~~ to ensure proper training standards and compliance with all relevant requirements ~~in of~~ this Part Regulation in conducting the training activities, including subcontracted activities, within its scope of work. Such procedures shall be agreed with the competent authority and approved through the approval of the exposition.
- (b) The ~~organisation shall establish a quality system including~~ training procedures established under this point shall ensure:
- ~~an independent audit function to monitor training standards, the integrity of knowledge examinations and practical assessments, compliance with and adequacy of the procedures, and~~ a clear agreement or contract has been concluded between the organisation and the person or organisation that requests the training activities, to clearly establish the training activities to be carried out and the conditions under which they will be carried out;
 - ~~a feedback system of audit findings to the person(s) and ultimately to the accountable manager referred to in point 147.A.105(a) to ensure, as necessary, corrective action. that~~ all the aspects of carrying out the training activities are covered.



AMC1 147.A.130(b)(1) Training procedures

DEVELOPING A TRAINING CONTRACT

The organisation should establish a clear contract or agreement with the person or organisation requesting training activities to include as a minimum:

(g) Responsibilities

The responsibilities of each party in respect to services being delivered should be specified, to include the responsibilities of the organisation to provide training activities to the standard specified in the MTOE, and the responsibilities of the student to comply with the rules and procedures of the organisation, to ensure resources, if applicable (e.g. in case of DLS the student should be made aware of their responsibilities to ensure appropriate facilities and equipment, as described by the organisation).

Special emphasis should be given to the responsibilities of each party in regard to the examination process, in particular the requirements of point 147.A.135(c). A provision should be included for the student to inform the organisation of any previously failed examinations or other prohibitions related to the training activities undertaken as described in point 147.A.135(d).



KEY TAKEAWAYS

- Contract or agreement is required before any training activity is carried out

RMT.0544 – Performance of training activities - Language

147.A.132 Performance of training activities

- (a) The organisation may only carry out training activities for which it is approved when all the necessary facilities, equipment, tooling, material, training data and personnel are available.
- (b) The organisation shall be responsible for the training activities that are performed within the scope of its work.
- (c) The organisation shall ensure:
 - (1) training activities are carried out in compliance with the applicable requirements and to the standards described in its procedures;
 - (2) the development of instructions on training methods and tools and their proper use;
 - (3) the language competence of personnel referred to in point 147.A.105(i) and of the students undergoing training activities;



AMC1 147.A.132(c)(3) Performance of training activities

- (a) The organisation should ensure that the students undergoing training activities possess a minimum level of language competence of CEFR Level B2 (or equivalent) in the language of the training activity and documentation.
- (b) When several languages are used in delivering the training activity, linguistic competence in each of the languages must be ensured at the level mentioned in point (a).
- (c) Linguistic competence should be ensured through a certificate issued by a recognised institute. The organisation may accept, as a result of its internal evaluation, any other equivalent attestation when satisfied that such attestation is accurate and equivalent to the level mentioned in point (a).
- (d) When the language used in delivering the training activity is the first language (native language) of the student, the organisation may accept a self-declaration issued by, or on behalf of, the student.



KEY TAKEAWAYS

- Language requirement for students
- B2 level required
- Certificate required, attestation acceptable
- Self-declaration for native speakers

RMT.0544 – Performance of training activities - Security

147.A.132 Performance of training activities

- (a) The organisation may only carry out training activities for which it is approved when all the necessary facilities, equipment, tooling, material, training data and personnel are available.
- (b) The organisation shall be responsible for the training activities that are performed within the scope of its work.
- (c) The organisation shall ensure:
 - (4) the security of its training activities, especially in respect of the examination process;



KEY TAKEAWAYS

- Physical and cyber security required
- Emphasis on the security of examination material as it becomes available on the day of the examination
- Emphasis on the security of the database at all times



AMC1 147.A.132(c)(4) Performance of training activities

- (a) The organisation should develop a system that allows it the establishment, monitoring and adaptation of security measures that cover all the aspects of delivering training activities, including but not limited to the security of facilities, instructional equipment, tooling and equipment, materials, part and components, aircraft, personnel and student records, training and examination records, training documentation, and examination material.
- (b) The organisation should emphasise on the security measures of MCQs and essays database and questionnaires, as applicable, and should be able to demonstrate effective continuous control over such measures. The organisation should ensure that access to examination material is limited only to personnel involved in the process, as described in its procedures.
- (c) The organisation should ensure it takes into account potential flaws and breaches when developing and adapting its system to correct and prevent such events from taking place.

RMT.0544 – Performance of training activities – Combating fraud

147.A.132 Performance of training activities

- (a) The organisation may only carry out training activities for which it is approved when all the necessary facilities, equipment, tooling, material, training data and personnel are available.
- (b) The organisation shall be responsible for the training activities that are performed within the scope of its work.
- (c) The organisation shall ensure:
 - (5) an effective system to combat and prevent any fraudulent actions is established and maintained, as part of its management system;

AMC1 147.A.132(c)(5) Performance of training activities

- (a) The organisation should develop a system in concert with the provisions of 147.A.132(c)(2) that allows it to prevent any fraudulent actions within its organisation, including but not limited to access to restricted information, receiving and disseminating restricted information (within or outside the organisation), cheating during examination and assessments, interference with the examination process or results.
- (b) The organisation should ensure that its system allows for appropriate measures in cases involving either its personnel or its students or both and should ensure that attempts at fraudulent actions are treated regardless of whether they are successful or not.

147.B.305 Oversight programme

- (c) The oversight planning cycle shall not exceed 24 months.
- (d) Notwithstanding point (c), the oversight planning cycle may be extended to 36 months if the competent authority has established that during the previous 24 months:
 - (1) the organisation has demonstrated that it can effectively combat fraudulent activities and ensure the security of the examination process;
 - (2) the organisation has continuously demonstrated compliance with point 147.A.150 and it has full control over all changes;
 - (3) no level 1 findings have been issued;
 - (4) all corrective actions have been implemented within the time period that was accepted or extended by the competent authority as provided for in point 147.B.350.
- (e) The oversight planning cycle may be shortened if there is evidence that the safety performance of the organisation has decreased.



KEY TAKEAWAYS

- Effectively combating and preventing fraud is adamant to the functioning of the AMTO
- Extension of oversight planning cycle dependent on combating fraud

RMT.0544 – Performance of training activities – Reporting to CA

147.A.132 Performance of training activities

- (a) The organisation may only carry out training activities for which it is approved when all the necessary facilities, equipment, tooling, material, training data and personnel are available.
- (b) The organisation shall be responsible for the training activities that are performed within the scope of its work.
- (c) The organisation shall ensure:
 - (6) a system of reporting to the competent authority of events referred to point 147.A.135(h) is established and maintained, as part of its management system;



AMC1 147.A.132(c)(6) Performance of training activities

- (a) The organisation should ensure that any reportable event as referred to in point 147.A.135 is reported under the established conditions and the imposed time interval, and any other information it considers relevant is reported in the shortest applicable time, to the competent authority.
- (b) Where the organisation holds or more additional organisation certificates within the scope of Regulation (EU) 2018/1139 and its delegated and implementing acts, it may use the reporting system developed to meet the requirements of Regulation (EU) No 376/2014 and its implementing acts for its reporting requirements under point 147.A.132(c)(6).



KEY TAKEAWAYS

- Reporting of cheating and fraud in the examination process

RMT.0544 – Performance of training activities – Activity report

147.A.132 Performance of training activities

- (a) The organisation may only carry out training activities for which it is approved when all the necessary facilities, equipment, tooling, material, training data and personnel are available.
- (b) The organisation shall be responsible for the training activities that are performed within the scope of its work.
- (c) The organisation shall ensure:
 - (7) the elaboration of an activity report to be provided to the competent authority on a yearly basis.



KEY TAKEAWAYS

- MTOs will provide the CA with an activity report for the past year
- Information to be used by CA in oversight activities and by MSs in standardising training across the EU



AMC1 147.A.132(c)(7) Performance of training activities

- (a) The organisation should ensure that the activity report it provides to the competent authority contains as a minimum the following information, segregated by training activity, as applicable to the scope of work:
 - (1) the number of sessions planned;
 - (2) the number of sessions undertaken, with dates and locations;
 - (3) explanation for the difference between the numbers in point (1) and (2), if applicable;
 - (4) the number, nature, and the location of training activities undertaken in locations other than the ones identified in the certificate and the exposition;
 - (5) the number of students undergoing the training activity, and their identification data;
 - (6) the results of training, examinations, assessments, and evaluations, for class rating;
 - (7) analyses of the examinations results, highlighting the passing and failure rates, by class rating.
- (b) This information should allow the competent authority to effectively monitor and evaluate the organisation, and to benchmark the results, especially those of examinations, against other organisations within the Member States.

RMT.0544 – Examination process - Responsibilities

147.A.135 Examination process

- (a) The organisation ~~examination staff~~ shall ensure the security of ~~all~~ the examination documentation and examination process ~~questions~~, under the responsibility of the examination manager.

Entire process, not just questions

Assign clear responsibility

AMC1 147.A.135(a) Examination process

- (a) The examination manager should ensure that each examination is carried out to the standard set out in the organisation's procedures.
- (b) The examination manager should ensure that examination questionnaires are selected from the database as close to the examination as possible, no sooner than the day of the examination, to ensure that their security is properly controlled.
- (c) The examination manager and examiner(s) should ensure that the examination location meets the requirements for a secure examination process such as:
- (3) if applicable, audio and video surveillance equipment should be used to monitor and/or record the examination process;
 - (4) if applicable, proctoring software should be used in the case of computer-based examinations;

Especially for 'unapproved' locations



KEY TAKEAWAYS

- EM is given clear responsibility for the examination process.
- MTO must take into account the applicable conditions for compliant examination in the chosen facility.
- MTOs and CAs are given the regulatory means and guidance to prepare the examinations in 'unapproved' locations

RMT.0544 – Examination process – Examinations

147.A.135 Examination process

AMC2 147.A.135(a) Examination process

- (a) Questions may be prepared in the national language, but the use of aviation English is recommended wherever possible.
- (b) The primary purpose of essay questions is to determine that the candidate can express themselves in a clear and concise manner and can prepare a concise technical report using the technical language of the aviation industry, which is why only a few essay questions are required. The essay questions also allow to assess, in part, the technical knowledge retained by the individual and with a practical application relevant to a maintenance scenario.
- (c) For pass mark purposes, the essay questions should be considered as separate from the multiple-choice questions.
- (d) Multiple-choice question (MCQ) generation



KEY TAKEAWAYS

- GM 66.B.200 transposed into AMC in Part-147.

RMT.0544 – Examination process – Allocation of examiner

147.A.135 Examination process

(b) The examination shall be carried out by an approved examiner referred to in point 147.A.105(j), under the oversight and responsibility of the examination manager.

Assign clear responsibility

Approved examiner, with personnel authorisation, not an invigilator nor any other unapproved MTO employee

AMC1 147.A.135(b) Examination process

(a) The examination manager should ensure that each examination is carried out by an appropriately approved examiner referred to in point 147.A.105(j).

(b) The examination manager should allocate examiners to a particular examination, based on the organisation's manpower planning and examiners' privileges as detailed in the training authorisation referred to in point 147.A.105(l).



KEY TAKEAWAYS

- EM is given clear oversight responsibility of the examiners.
- EM should assign the examiners or have a process in place to allocate them.
- MTO must ensure sufficient resources.
- Examiner must be authorised to carry out the particular type of examination e.g basic vs type, only certain modules (especially for academia), only certain systems

RMT.0544 – Examination process – Set of rules

147.A.135 Examination process

(c) The organisation shall develop a set of rules for the examination process, as part of the examination procedure referred to in point 147.A.140(a)(12), including as a minimum:

(1) duties and responsibilities of the examiner in relation to the examination process;

(2) documentation to be provided by the examinees at the moment of the examination to ensure their identification by the examiner;

Open requirement in order to comply with national legislation on data protection. The expected document to be presented is an official ID card. Other official documents may be accepted e.g. driver's licence.

It is not expected that the MTO retains a copy of the document presented on the day of the examination. However, MTOs may choose to define such a requirement in their procedures.

What the MTO or CA might consider obvious requirement or normal behaviour might not be perceived as such by the student. These should be clearly defined.

The language(s) used must ensure full understanding on behalf of both parties.

KEY TAKEAWAYS

- Need for a documented set of rules for the examination

RMT.0544 – Examination process – Declaration of awareness

147.A.135 Examination process

(c) The organisation shall develop a set of rules for the examination process, as part of the examination procedure referred to in point 147.A.140(a)(12), including as a minimum:

(3) a declaration of awareness to be acknowledged by the examinee, regarding their rights, responsibilities and obligations, including as a minimum:

(i) the examinee's obligation to adhere to the rules of the examination process;

(ii) clear mention of, and direct reference to, the measures referred to in point (i) below;

(iii) the examinee's obligation to report through the reporting scheme referred to in point 147.A.110(a)(6) to the organisation suspicions of violation of the examination rules or any other event related to fraudulent actions in which the examinee is directly involved, and the appropriate and effective means to do so, including the possibility of anonymous reporting;

(iv) the encouragement of the examinee to voluntarily report to the organisation suspicions of violation of the examination rules or any other event related to fraudulent actions which they witnessed without being directly involved, and the appropriate and effective means to do so, including the possibility of anonymous reporting;

(v) the examinee's right to report to the competent authority suspicions of violation of the examination rules or any other event related to fraudulent actions and the means provided by the competent authority to do so;

(vi) the examinee's obligation to inform the organisation of any relevant previously failed examinations and any prohibitions as described in point (h).



KEY TAKEAWAYS

- Declaration of awareness before each exam

Necessary to record that the examinee understand the set of rules.

It should be clear in the declaration what the measures are, and there must be a reference to the point of the regulation so that examinees may search the source of such measures with ease.

Mandatory reporting of events in which the examinee is involved e.g. approached by another examinee or by trainer or examiner to receive/purchase examination material.

The MTO must encourage the examinee to report any such witnessed actions e.g. examinee observes an exchange of examination material prior to exam, or answers during the exam.

The MTO must encourage the examinee to report any such witnessed actions e.g. examinee observes an exchange of examination material prior to exam, or answers during the exam.

Similar point in the contract/agreement. The examinee may undertake examinations elsewhere after signing the contract with the MTO, so updated information is necessary before each examination.

RMT.0544 – Examination process – Examination plan

147.A.135 Examination process

- (d) The organisation shall submit to the competent authority its examination plan, and consequently notify it of any amendments, emphasising the examinations taking place in locations other than the ones identified in the certificate and the exposition. The notification shall be sent to the competent authority as soon as possible, but no later than 1 week before the examination takes place.
- (e) The organisation shall also notify the authority of the Member State in which the examination takes place, if different from the competent authority of the organisation.
- (f) Examinations taking place in locations other than the ones identified in the certificate and in the exposition, shall be conducted under the supervision of an inspector designated by the competent authority.
- (g) The organisation shall develop a system, described in the examination procedure, which ensures that in the case of examinations referred to in points (f) and (g), the examination questionnaires can be selected only by the competent authority inspector at the time of the examination and not earlier than the examinees and examiner(s) being present in the examination room.
- (h) The organisation shall ensure that any student found during an **knowledge** examination to be cheating or in possession of material pertaining to the examination subject other than the examination **papers material** and associated authorised documentation **or in violation of the examination rules** shall be disqualified from **taking** the examination and **may not take** prohibited from taking any examination **within the organisation** for at least **12 48** months after the date of the incident.
- The organisation shall ensure that it informs the competent authority **shall be informed of any such incident together with the details of any enquiry** within 72 hours of such an event **one calendar month** and provide any additional information considered relevant or requested by the competent authority within 1 month of the event or earlier within the period established by the competent authority.

Increased cooperation between authorities. To be read in conjunction with 147.B.300(d) and (e)

147.B.300 Oversight principles

- (d) If the facilities of an organisation are located in more than one State, the competent authority, as defined in point 147.1, shall consider to agree to have the oversight tasks performed by the competent authority(ies) of the Member State(s) where the facilities are located, or by the Agency for facilities that are located outside a territory for which Member States are responsible under the Chicago Convention. Any organisation that is subject to such an agreement shall be informed of its existence and of its scope.
- (e) For any oversight activities that are performed at facilities located in a Member State other than where the organisation has its principal place of business, the competent authority, as defined in point 147.1, shall inform the competent authority of that Member State before performing any on-site audit or inspection of the facilities.



KEY TAKEAWAYS

- Examination plan to be submitted to the CA
- Cooperation between CAs on oversight
- Increased period of prohibition on examination from 12 months to 48 months
- Reporting time becomes 72 hours

RMT.0544 – Examination process – Applicant fraudulent activities

147.A.135 Examination process

- (e) The examination shall be performed in a controlled environment by a training organisation approved under this Annex and described in its maintenance training organisation exposition

AMC1 147.A.135(j) Examination process

INVOLVEMENT OF APPLICANTS IN FRAUDULENT ACTIVITIES

An organisation receiving information regarding the ineligibility of an applicant to undertake an examination, either directly from the applicant through the means referred to in 147.A.130(b)(1) or from another Part-147 approved maintenance training organisation or a competent authority or any other source, should record and analyse such information, and take appropriate measures, either to prohibit the applicant from undertaking the examination and, if deemed necessary, to report the event to the competent authority, or to report the information as incorrect, and if applicable, to report the source as unreliable.

Measure 1: accept the information as reliable and act upon it to prohibit the applicant from taking the exam

Measure 2: report to the CA so that appropriate measures may be taken against the applicant



KEY TAKEAWAYS

- Organisation must assess information regarding examinees ineligibility e.g.
 - Within the prohibition period for examination
 - Involvement in obtaining examination material
- Organisation must take appropriate action

Measure 3: inform the source (if possible) that their information is incorrect

Measure 4: if needed, inform the CA of the unreliable source. We do not want anyone with a grudge trying to cause harm, nor decreasing the reliability of the system

RMT.0544 – Examination process – Personnel fraudulent actions

147.A.135 Examination process

- (e) The examination shall be performed in a controlled environment by a training organisation approved under this Annex and described in its maintenance training organisation exposition

AMC1 147.A.135(j) Examination process

INVOLVEMENT OF ORGANISATION PERSONNEL IN FRAUDULENT ACTIVITIES

An organisation receiving information regarding the involvement of any of its nominated persons referred to in points 147.A.105(a), (b), and (c) or any of its instructors or examiners referred to in point 147.A.105(j) in the violation of examination rules or any other event related to fraudulent actions, from another Part-147 approved maintenance training organisation or a competent authority or any other source, should record and analyse such information, and take appropriate measures to ensure that the person will no longer be authorised to perform any duties related to the activities in the scope of work of the organisation.

The organisation should ensure that any person involved in the violation of the examination rules or in any other event related to fraudulent actions will no longer be authorised to perform any duties related to the activities in the scope of work of the organisation and take proportional and adequate measures in accordance with applicable regulations.

Special measures to ensure that transitioning to another post within the same company, but different approval would not be possible

'Take proportional and adequate measures in accordance with applicable regulations' means that if the organisation decides not to, or is otherwise unable to, end the (employment) contract of or agreement with the person involved in the violation of the examination rules or any other event related to fraudulent actions, it may retain the services of such person, nevertheless ensuring that such person immediately ceases any activity within the Part-147 approved maintenance training organisation.

The competent authority should ensure that management personnel, trainers, and examiners involved in the violation of the examination rules, or any other event related to fraudulent action will no longer be approved for a position within an approved maintenance training organisation or any similar role in any approved organisation e.g. instructor in Part-145 organisation or Part-21G organisation.

The organisation should, in concert with the above-mentioned measures for trainers and examiners involved in the violation of the examination rules or any other event related to fraudulent actions, immediately suspend the personnel authorisation pending the internal investigation, or directly revoke the personnel authorisation.

The organisation should inform the competent authority within 72 hours of such an event and provide any additional information considered relevant or requested by the competent authority within 1 month of the event or earlier within the period established by the competent authority, or report the information as incorrect, and if applicable, report the source as unreliable.

No authority over the employment of the person, but we can ask that they are completely excluded from the activities of the MTO

RMT.0544 – Privileges of the organisation – Appendix IV

147.A.145 Privileges of the maintenance training organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:

Appendix IV to Annex IV — 147.A.20 Terms of approval and scope of work

(d) Category 'Basic training' class rating

Basic training shall consist of basic knowledge theoretical training and examinations, and basic knowledge practical training and assessments referred to in the Appendices to Annex III (Part-66) applicable to the aircraft maintenance licence category or subcategory at the level required by the Appendices.

When the organisation has more than one category or subcategory basic training in its terms of approval, a combined training for more than one category or subcategory from its terms of approval and training necessary for the change of an aircraft maintenance licence by adding a category or subcategory (extension), shall be considered part of the terms of approval, subject to both (sub)categories being covered by the scope of work of basic training.

Basic knowledge theoretical examination without its corresponding basic knowledge theoretical training shall be considered part of the terms of approval.

The limitation column must specify the scope of basic training by aircraft maintenance licence category or subcategory, when applicable, thereby indicating the extent of the approval.



KEY TAKEAWAYS

- BT must include all 4 elements
- BT includes combined and differences trainings
- BT includes examination without training

Basic training must include all 4 elements: Th training + Th examination and Pr training + Pr assessment

For basic training combined training and differences training are included in approval, if all (sub)categories are in the scope of work

Examination without training is considered part of the approval

RMT.0544 – Privileges of the organisation – Appendix IV

147.A.145 Privileges of the maintenance training organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:

Appendix IV to Annex IV — 147.A.20 Terms of approval and scope of work

(e) Category 'Aircraft type training' class rating

Aircraft type training shall consist of aircraft type theoretical training and examination, and aircraft type practical training and assessment, specific to an entire aircraft maintenance licence category or subcategory and shall be approved by the competent authority.

Training covering the differences between two different aircraft type ratings of the same manufacturer or between two aircraft maintenance licence categories for the endorsement with the same aircraft type rating, shall be considered part of the terms of approval, subject to both aircraft types being covered by the scope of work for aircraft type training.

The aircraft type rating column must specify the aircraft type rating, thereby indicating the extent of the approval.

ATT must include all 4 elements: Th training + Th examination and Pr training + Pr assessment

For ATT combined training and differences training are included in approval, if all a/c types and licence categories are in the scope of work



KEY TAKEAWAYS

- BT must include all 4 elements
- BT includes combined and differences trainings

GM1 Appendix IV to Annex IV — 147.A.20 Terms of approval and scope of work

AIRCRAFT TYPE TRAINING	ATT.B1 (AML Category B1)	B1.1 – AEROPLANES TURBINE	1. Airbus A318/A319/A320/A321 (CFM56) 2. Airbus A319/A320/A321 (CFM LEAP-1A) 3. Airbus A319/A320/A321 (IAE PW1100G) 4. Aero Ae-270 (PWC PT6) Differences training(s): 1→2; 1→3; 1→2/3; 2→3; 3→2
		B1.2 – AEROPLANES PISTON	1. Thorp T-211 (Continental) 2. Aero AT-3 (Rotax) 3. IAR-46 (Rotax)
		B1.3 – HELICOPTERS TURBINE	1. Agusta AB204, AB205 / Bell 204, 205 (Honeywell T53) 2. Eurocopter AS 332 (Turbomeca Makila 1A/1A1) 3. Eurocopter AS 350 (Lycoming LTS101) Differences training(s): 2→3; 3→2
		B1.4 – HELICOPTERS PISTON	1. Silvercraft SH-4 (Franklin)

RMT.0544 – Privileges of the organisation – Appendix IV

147.A.145 Privileges of the ~~maintenance training~~ organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:

Appendix IV to Annex IV — 147.A.20 Terms of approval and scope of work

(f) Category 'Aircraft type evaluation' class rating

Aircraft type evaluation shall consist of aircraft type theoretical examination and aircraft type practical assessment, specific to an entire aircraft maintenance licence category or subcategory.

(g) Category 'Aircraft task training' class rating

Aircraft task training shall consist of aircraft task theoretical training and examination, and aircraft task practical training and assessment, specific to an entire aircraft maintenance licence A category or subcategory.



KEY TAKEAWAYS

- ATE and ATK must include all 4 elements



ATE must include all 4 elements: Th training + Th examination and Pr training + Pr assessment (requirements aligned with reg 989/2023)

ATK must include all 4 elements: Th training + Th examination and Pr training + Pr assessment

RMT.0544 – Privileges of the organisation

147.A.145 Privileges of the ~~maintenance training~~ organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:

(i) basic training;

(ii) by derogation from point (i), part of the basic training to include both the basic knowledge theoretical training and examination element, and the basic knowledge practical training and assessment element, as applicable, specific to an aircraft maintenance licence (sub)category, solely in specific cases such as the extension of an aircraft maintenance licence, the conversion of certifying staff qualification referred to in point 66.A.70 and Subpart D of Section B of Annex III (Part-66), and the examination crediting referred to in point 66.A.25(e) and Subpart E of Section B of Annex III (Part-66);

(iii) basic knowledge theoretical examination;

Part of basic training - conditions:

- All 4 elements must be included: Th training + Th exam and Pr training + Pr assessment, as applicable
- Specific to a (sub)category – not random modules

Part of basic training – limitation to certain cases:

- AML extension e.g. B1.1 to B2
- Conversion to AML – training identified by the LA as necessary to obtain the required AML (sub)category (conversion report)
- Credits - training identified by the LA as necessary to obtain the required AML (sub)category (credit report)
- Special circumstances outside the control of student
 - MTO loses approval
 - Change of residence rendering training impossible in initial MTO



KEY TAKEAWAYS

- Part of basic training is possible with conditions and limited to certain cases
- Must include all applicable training elements

GM1 147.A.145(a)(1)(ii) Privileges of the organisation

PART OF BASIC TRAINING

- (a) 'Part of basic training to include both the basic knowledge theoretical training and examination element, and the basic knowledge practical training and assessment element, as applicable' is intended to mean that the partial training does not cover the entire content of the basic training, but for the content that it does cover, it uses all training elements as applicable to the modules that form part of the corresponding basic training.
- (b) Part of the basic training for the extension of an aircraft maintenance licence is intended to mean the training required to obtain the knowledge (theoretical, practical, or both theoretical and practical, as applicable) identified as differences between the existing AML (sub)category (chosen as 'the source') and the AML (sub)category to be obtained ('the target').

RMT.0544 – Privileges of the organisation

147.A.145 Privileges of the ~~maintenance training~~ organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:

(iv) aircraft type training;

(v) part of the aircraft type training to include either the aircraft type theoretical training and examination element or the aircraft type practical training and assessment element;

(vi) part of the aircraft type training covering the differences between two different aircraft type ratings of the same manufacturer or between two aircraft maintenance licence categories for the endorsement with the same aircraft type rating;

(vii) aircraft type evaluation;

(viii) aircraft task training;

Part of aircraft type training - conditions:

- Complete theoretical element: Th training + Th examination, or
- Complete practical element: Pr training + Pr element

Part of aircraft type training - conditions:

- Differences training
- Not to be used in conjunction with point (v)



KEY TAKEAWAYS

- Part of aircraft type training is possible with conditions
- Must include either the theoretical or the practical element
- Increased flexibility for ATT
- NEW privilege: aircraft type evaluation
- NEW privilege: aircraft task training

RMT.0544 – Privileges of the organisation - Subcontracting

147.A.145 Privileges of the ~~maintenance training~~ organisation

- (a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:
- (2) Issue certificates of recognition referred to in Appendix III to this Annex in respect of completion of the training activities described in point (a) in accordance with this Annex and Annex III (Part-66);
 - (3) arrange for a limited range of training activities, which may not include any complete training activity, to be conducted by a subcontracted organisation that works under the management system of the organisation, subject to the conditions specified in the exposition;

BT may be subcontracted:

- Only for modules 1 to 6, 8 to 10
- Must include all 4 elements, as applicable to the modules

ATT may be subcontracted:

- Only for the theoretical element of powerplant (with the mention on responsibility for interface training), or
- Only for the complete practical element



KEY TAKEAWAYS

- Training activities may be partially subcontracted with conditions

RMT.0544 – Privileges of the organisation – ‘Unapproved’ locations

147.A.145 Privileges of the ~~maintenance training~~ organisation

(a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:

(4) Provide training activities for which it is approved at locations other than the ones identified in the certificate and the exposition, subject to the need for such training arising from the infeasibility of providing it at the approved locations or from the necessity of supporting occasional training activities, and subject to the following conditions:

(i) the maximum number of sessions of training activities to be carried out in all such locations shall be limited to three sessions per oversight cycle of the organisation;

(ii) any training activity carried out in such locations beyond the limitation mentioned in point (i) shall require the approval of the location.

Training activities in ‘unapproved’ locations – limitations to special cases:

- Infeasibility of using the approved facilities e.g. (temporary) loss of capabilities
- Supporting occasional training activities e.g. a single group of students in need of a one-time training on a different continent than the approved facilities



KEY TAKEAWAYS

- Training in ‘unapproved’ locations is acceptable only under certain conditions and for a limited number of times

Training activities in ‘unapproved’ locations – conditions:

- Maximum of 3 sessions of cumulated training activities / oversight cycle

RMT.0544 – Privileges of the organisation – Conditioned by training

147.A.145 Privileges of the maintenance training organisation

- (a) In accordance with the exposition, the organisation shall be entitled to carry out the following tasks:
- (1) Provide any training activity defined in Appendix IV to this Annex for which it is approved at the locations identified in the certificate and in the exposition, as follows:
 - (iii) basic knowledge theoretical examination;
 - (v) part of the aircraft type training to include either the aircraft type theoretical training and examination element or the aircraft type practical training and assessment element;
 - (vi) part of the aircraft type training covering the differences between two different aircraft type ratings of the same manufacturer or between two aircraft maintenance licence categories for the endorsement with the same aircraft type rating;
- (b) The privilege to carry out basic knowledge theoretical examinations referred to in point (a)(1)(iii) shall be dependent upon the organisation carrying out at least one training activity referred to in point (a)(1)(i) within two consecutive oversight cycles or at least one training activity referred to in point (a)(1)(ii) within one oversight cycle.
- (c) The privilege to carry out the training activities referred to in points (a)(1)(v) and (a)(1)(vi) shall be dependent upon the organisation carrying out at least one training activity referred to in point (a)(1)(iv) within one oversight cycle.
- (d) Failure to comply with points (b) and (c) shall result in the restriction of the associated privilege(s) through the limitation, suspension, or revocation of the certificate, as appropriate, in accordance with point 147.B.355.



KEY TAKEAWAYS

- BT examination privilege and partial ATT privilege conditioned by carrying out complete trainings

Privilege for BT examinations without training – conditions:

- Minimum of 1 basic training / 2 oversight cycles

Privilege for partial ATT – conditions:

- Minimum of 1 ATT / oversight cycle

RMT.0544 – Basic training

147.A.200 ~~The approved~~ Basic training ~~course~~

- (a) Basic training shall consist of basic knowledge theoretical training and examination, and basic knowledge practical training and assessment.
- (b) Basic training shall be delivered in accordance with the provisions of point 147.A.132.
- (c) The basic knowledge theoretical training element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendices I and VII to Annex III (Part-66).
- (d) The basic knowledge practical training element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendices I and VII to Annex III (Part-66).
- (e) The basic knowledge practical training element shall be partially performed in an actual maintenance working environment.
- (f) The duration of basic training shall be determined in accordance with Appendix I to this Annex and specified in the exposition.
- (g) Notwithstanding point (f), the minimum duration of basic training as established in Appendix I to this Annex may be amended, in order to benefit from improved training methods and tools and new teaching technologies, or from credits specified in point 66.A.25(e) of Annex III (Part-66), provided that the syllabus content and schedule describe and justify the proposed changes, and subject to a control procedure included in the MTOE.
- (h) The duration of training for conversion from one aircraft maintenance licence (sub)category to another shall be determined through an assessment of the basic training requirements, subject to a control procedure described in the MTOE.



KEY TAKEAWAYS

- Refers back to 147.A.132 for conditions of delivery
- Other elements remain mostly unchanged

Requirement introduced with RMT.0281; paves the way for novelties such as CBTA; works well in the context of management system of AMTO and extension of oversight planning cycle

Refers to extension, not conversion;

RMT.0544 – Basic training

147.A.205 Basic knowledge theoretical examination

The basic knowledge theoretical examination element shall:

- (a) be conducted to the standards described in Appendices II and VIII to Annex III (Part-66);
- (b) be conducted in accordance with points 147.A.132 and 147.A.135.

147.A.210 Basic knowledge practical assessment

The basic knowledge practical assessment element shall:

- (a) be conducted as part of the basic training in a manner established by the organisation and described in its exposition;
- (b) be conducted to the standards described in Appendices I and VII to Annex III (Part-66);
- (c) be conducted in accordance with points 147.A.132 and 147.A.135.



KEY TAKEAWAYS

- Refers back to 147.A.132 for conditions of delivery
- Other elements remain mostly unchanged

RMT.0544 – Aircraft type training

147.A.300 Aircraft type ~~task~~ training

- (a) Aircraft type training shall consist of aircraft type theoretical training and examination, and aircraft type practical training and assessment.
- (b) Aircraft type training shall be delivered in accordance with the provisions of point 147.A.132.
- (c) Aircraft type training shall be approved by the competent authority through the approval of the MTOE.
- (d) The aircraft type theoretical training and examination element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendix III to Annex III (Part-66).
- (e) The aircraft type practical training and assessment element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendix III to Annex III (Part-66).
- (f) The duration of aircraft type training shall be determined in accordance with Appendix III to Annex III (Part-66) and specified in the exposition.
- (g) The duration of training for differences between two different aircraft type ratings of the same manufacturer or between two aircraft maintenance licence categories for the endorsement with the same aircraft type rating shall be determined through an assessment of the aircraft type training requirements, subject to a control procedure described in the exposition.
- (h) By derogation from points (d) to (g), in the case of gas airship type ratings to be endorsed on a B2 or L5 category licence, aircraft type training shall be developed by the organisation to a standard approved by the competent authority in accordance with point 66.B.130.



KEY TAKEAWAYS

- Refers back to 147.A.132 for conditions of delivery
- Approval through MTOE
- Duration requirements more clear

RMT.0544 – Basic training

147.A.400 Aircraft type evaluation

- (a) Aircraft type evaluation shall consist of aircraft type theoretical examination and aircraft type practical assessment, specific to an entire aircraft maintenance licence (sub)category.
- (b) Aircraft type evaluation shall be performed in accordance with the provisions of point 147.A.132.
- (c) Aircraft type evaluation shall be approved by the competent authority through the approval of the MTOE.
- (d) Aircraft type evaluation shall be performed in accordance with the provisions of, and to the standard described in, Appendix III to Annex III (Part-66).
- (e) The aircraft type theoretical examination element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendix III to Annex III (Part-66).
- (f) The aircraft type practical assessment element shall cover the subject matter for an aircraft maintenance licence (sub)category as specified in Appendix III to Annex III (Part-66).



KEY TAKEAWAYS

- New requirement for new privilege and terms of approval
- Refers back to 147.A.132 for conditions of delivery
- ATE shall be approved by the CA through the MTOE

RMT.0544 – Basic training

147.A.500 Aircraft task training

- (a) Aircraft task training shall consist of aircraft task theoretical training and examination, and aircraft task practical training and assessment, specific to an entire aircraft maintenance licence A (sub)category.
- (b) Aircraft task training shall be performed in accordance with the provisions of point 147.A.132.
- (c) Aircraft task training shall be performed in accordance with the provisions of, and to the standard described in, point 145.A.35.
- (c) The aircraft task theoretical training and examination elements shall be appropriate to the aircraft type(s) and, when applicable, the aircraft maintenance task(s) required by the approved maintenance organisation.
- (d) The aircraft task practical training and assessment elements shall be appropriate to the aircraft type(s) and, when applicable, the aircraft maintenance task(s) required by the approved maintenance organisation.



KEY TAKEAWAYS

- New requirement for new privilege and terms of approval
- Refers back to 147.A.132 for conditions of delivery
- Reference to AMO requirements for Cat A AML



Feedback always welcome!

Participation to the consultation is essential!

Comment period on the NPA end on 4 March 2024 – please provide your input

Please provide answers to the NPA questions

Thank you for your participation!

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