

You can save this page as HTML and then open it in Microsoft Word for further editing.

Title	Review of Part-66
NPA Number	NPA 2020-12

UK CAA (European.Affairs@caa.co.uk) has placed **18** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
188	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66)	10 - 24	<p>Page No: 13</p> <p>Paragraph No: 66.A.25 Basic competency knowledge requirements (g)</p> <p>Comment: To clarify the meaning of 'type of aircraft' we recommend the below wording in brackets is added.</p> <p>Justification: Clarity</p> <p>Proposed Text: The applicant for the category C licence shall demonstrate by examination the same level of knowledge as for the modules applicable to the B1 or B2 category. The modules shall be relevant to the type of aircraft (either complex or other than complex motor-powered aircraft) the category C licence will be applicable to.</p>	
189	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66)	10 - 24	<p>Page No: 16</p> <p>Paragraph No: GM 66.A.30(a) Basic experience requirements, para 2</p> <p>Comment: We suggest the current statement of '3 or 6 months...' is not very clear.</p> <p>Justification: The current wording does not give any guidance when it could be 3 months or when it should be 6 months.</p> <p>Proposed Text: Suggest a clearer statement would be 'at least 6 months...'</p>	
190	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66)	10 - 24	<p>Page No: 17</p> <p>Paragraph No: GM 66.A.30(a) Basic experience requirements, para 2 and 3</p> <p>Comment: We believe this experience should be evidenced with an engineering logbook providing details such as date, place, organisation, aircraft registration etc.</p>	
191	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66)	10 - 24	<p>Page No: 22</p> <p>Paragraph No: 66.B.115 Procedure for the change of an aircraft maintenance licence to include an aircraft rating or to remove limitations (c)</p> <p>Comment: The text requires clarification of what type of evidence is to be requested by Competent Authority in cases when OJT was delivered by an AMO whose Competent Authority differs from the Authority issuing the licence. This could include EASA Form 3 AMO approval certificate, evidence of approval of revision of MOE that incorporates procedures under Chapter 3.15 etc.</p>	

			<p>Additionally, clarification if the Licensing Authority should liaise with the Authority that issued the AMO approval or directly with the AMO would be beneficial.</p> <p>Justification: Clarity</p>	
192	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66)	10 - 24	<p>Page No: 23</p> <p>Paragraph No: 66.B.130 Procedure for the direct approval of aircraft type training (c)</p> <p>Comment: Using the Certificate of Recognition (CoR) (EASA Form 149b) for directly approved courses could introduce ambiguity to the licensing process as the EASA Form 149b template does not include a statement confirming that the certified element of training has been directly approved by the Competent Authority.</p> <p>We believe a more appropriate reference would be to EASA Form 149c. This would also be consistent with the amendment of Appendix III to Part 147, as proposed.</p> <p>The intended validity of EASA Form 149c is unclear. If the intended validity for the acceptance of EASA Form 149c is 3 years, similar to EASA Form 149a and 149b, this could be inconsistent with AMC to 66.B.130. AMC to 66.B.130 states: 'The direct approval of aircraft type training should be done on a case by case basis and should not be granted for long term periods, since it is not a privilege of the organisation providing the training.'</p>	
193	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 27, 28, 88</p> <p>Paragraph No: 3rd table (p27), 1st table (p28), para 2.3 (p88)</p> <p>Comment: We believe the original wording 'Electrical Fundamentals' of the Module 3 title is a better use of language. It is recommended to revert back to the original wording.</p> <p>Justification: Clarity</p>	
194	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 39</p> <p>Paragraph No: Module 18 Practical Assessment</p> <p>Comment: In general, we agree with the new concept of the Module 18. However, it would be beneficial to give some indication as to what assessment criteria is to be used, who will be performing the assessment and how it will be recorded.</p> <p>Further clarification is required as the guidance seems to be incomplete. It is not clear how many maintenance tasks are to be assessed for a B1/B2/B3 external candidate, whether it is 1, 26 or 1 per each intended competence as defined on the relevant AMC.</p> <p>It is unclear what supporting evidence would be required, e.g. training needs analysis, samples of practical assessment exercises, to be submitted by an MTO when delivering Module 18.</p> <p>It is unclear whether any MTO approved for basic training is also automatically approved to deliver Module 18 without further checks. Further guidance on specific qualification of practical assessors, how will the NAA evaluate the delivery of Module 18, and how long would the applicant be expected to wait to</p>	

			re-try the Module 18 examination if they were to fail, would be beneficial.	
195	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 39</p> <p>Paragraph No: 3 Basic training methods</p> <p>Comment: It would be beneficial to state that MBT as a method of training can be used to enhance the training. The combination of physical and virtual training needs further clarification. The risk is that we could see all training being delivered virtually only. This would fall outside the pedagogical doctrines.</p>	
196	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 39</p> <p>Paragraph No: GM to Section 1 of Appendix I</p> <p>Comment: The NAA determines a process by which credits from national further education establishments are accepted. It is unclear, however, if this credit could be accepted internationally.</p>	
197	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 87</p> <p>Paragraph No: AMC to Section 3 of Appendix I to Part-66 'Basic training requirements'</p> <p>Comment: Whether it is instructor centred or student-centred training method, the training itself needs to include face to face interaction between both sides. This aspect should be reflected in the AMC rather than leaving it open to interpretation.</p> <p>Further clarification of instructor-centred, student-centred and blended training would be beneficial. It is unclear what alternative provisions used to verify the actual and progressive acquisition of skills and attitude by the student are expected here when Modules 7, 9, 11, 12, 13, 15, 16 and 17 are taught just by the student-centred method. Additionally, the reason for not including Module 14 Propulsion is unclear.</p>	
198	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 87</p> <p>Paragraph No: Appendix II — Basic Examination and Assessment Standard (except for category L licence)</p> <p>Comment: The reason for removing Module 9 essay is unclear. There is a strong argument that Module 9 is the most important essay to write as it is all about communication.</p>	
199	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)	25 - 213	<p>Page No: 91</p> <p>Paragraph No: 3. MODULE 18 — Practical assessment</p> <p>Comment: It would be beneficial to define the assessment criteria for the assessors and when and how these assessments take place. It is unclear what methods should be used, e.g. the assessment could include a presentation of course work, a practical task and a focused oral assessment. The oral part could include topics such as health and safety, human factor elements and documentation.</p>	

			<p>The 4th paragraph states: ‘After the third failed attempt, an approved skills training is necessary addressing all the criteria of Module 18.’ It is unclear what constitutes ‘an approved skills training’, who is approving it?, whether it should be approved directly by the Competent Authority, should it be delivered by an approved Part 147 Basic Training MTO?, how long should it take? A clearer guidance would eliminate confusion.</p>	
200	<p>3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)</p>	25 - 213	<p>Page No: 91</p> <p>Paragraph No: AMC to Appendix II — Number of questions per subject</p> <p>Comment: Dictating the maximum number of questions per module is limiting and potentially does not allow for the subject to be fully examined.</p> <p>Additionally, type training is not restricted to a maximum number of questions. Therefore it is unclear why basic training is restricted.</p> <p>Proposed Text: We recommend a more practical solution would be using the following: “a minimum number of questions which cannot be increased by more than 25%”.</p>	
201	<p>3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)</p>	25 - 213	<p>Page No: 139</p> <p>Paragraph No: 18. MODULE 18 — PRACTICAL ASSESSMENT</p> <p>Comment: Guidance is needed as to who, what and where does the assessment take place, how is the event recorded and what are the criteria for re-assessment.</p> <p>Further guidance is also needed as to what qualifications the assessor needs in order to perform these assessments. Perhaps they could be identified within Part 147 MTOE.</p> <p>The tables referred to in the “Duration of the assessment” paragraph seem to be missing, or a reference needs to be included as to where the tables can be found</p>	
202	<p>3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)</p>	25 - 213	<p>Page No: 143</p> <p>Paragraph No: 5. Type examination standard for Group 2 and Group 3 aircraft</p> <p>Comment: Please clarify the implications of removing the reference to oral examination</p>	
203	<p>3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)</p>	25 - 213	<p>Page No: 167, 185 and 208</p> <p>Paragraph No: MODULE 13L. PRACTICAL ASSESSMENT</p> <p>Comment: We suggest consider renaming the practical assessment module to Module 18L. This would make it consistent with Appendix II (for B1, B2 and B3 licences). Otherwise it may be confusing.</p> <p>Justification: Clarity</p>	
204	<p>3. Proposed amendments and rationale in detail 3.1. Draft regulation</p>	25 - 213	<p>Page No: 213</p> <p>Paragraph No: A. SPECIFIC TASKS FOR AEROPLANES AND HELICOPTERS</p>	

	and draft AMC and GM ANNEX III (PART-66) APPENDICES TO ANNEX III (PART-66)		Comment: Further clarification is required. It is not clear whether the % of completed tasks for OJT for each of the categories of tasks (INS-FOT-R/I-MEL-T/S) that appear at the top of each of the new tables, are the minimum required to complete in order to qualify for those tasks listed in each specific table, or it is the minimum required to complete from the total number of relevant tasks listed in all the tables.	
205	3. Proposed amendments and rationale in detail 3.1. Draft regulation and draft AMC and GM ANNEX IV (PART-147)	246 - 252	<p>Page No: 248</p> <p>Paragraph No: AMC 147.A.115(a) Instructional equipment</p> <p>Comment: The abbreviated term 'CBT' used here for 'computer based training' may be easily confused with the existing official use of the term 'CBT' used for 'Competency Based Training'.</p>	