

Part 145 - 6/24 month Recency Guidance

CAP 2377



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Requirements

1.1 Applicable Requirements 145.A.35(c)

The maintenance organisation shall ensure that all certifying staff (C/S) and base maintenance support staff (S/S) are involved in at least six months (or 100 days) of actual relevant aircraft or component maintenance experience, in any consecutive two-year period.

1.1 Maintenance Organisation Exposition

The maintenance organisation is required to detail in their MOE a procedure describing how the C/S and S/S shall demonstrate the compliance with the above requirement and how control of this requirement is ensured.

This procedure shall be established for:

- ★ issuing an initial individual UK Part-145 C/S S/S individual authorisation.
- ★ renewing an individual UK Part-145 C/S S/S individual authorisation.

met by any holder of an UK Part-145 C/S - S/S individual authorisation issued under any rating, as applicable depending on the scope of approval hold by the maintenance organisation and for:

- > A rating (A1, A2, A3 or A4), Aircraft certifying staff and/or support staff.
- > B rating (B1, B2 or B3), Engines, APU certifying staff.
- > C rating (from C1 to C22), Components certifying staff.
- > D1 rating (any NDT method), specialised services certifying staff.

Definition of Experience

2. Definition

The 6 months maintenance experience in 2 years shall be understood as consisting of two elements:

- duration
- **nature** of the experience.

The minimum to meet the requirements for these elements may vary depending on the size and complexity of the aircraft /engine/component and type of operation and maintenance.

The experience acquired/recorded on a specific aircraft/component/engine/APU type may also be used to demonstrate having or maintaining the experience on a similar aircraft/component/engine/APU type. When the UK CAA Part-145 intends to use the privilege of "similar aircraft/component/engine/APU" for the demonstration of the 6/24 months requirement, the MOE chapter 3.4 shall include: definitions of similar aircraft/engines/components/APUs types relevant to the scope of work hold by the maintenance organisation, (refer to the CAP 2375 Part 145 Exposition User guide).

The experience must be gained in an UK Part-145 (or a suitably agreed alternative). However, experience gained on a similar A/C, Engine, component technology in a similar environment may be considered acceptable subject UK CAA approval.

2.1 Duration

C/S and/or S/S shall demonstrate to have acquired within a maintenance organisation, in any consecutive 2-year period:

- 6 months working with the same maintenance organisation; or
- 6 months split up into different blocks, working within the same or in different maintenance organisations.

2.2 Nature

C/S and/or S/S shall demonstrate maintenance **activity** performed (and/or supervised and/or released to service) within an approved maintenance organisation on a comprehensive combination of different **task types** (i.e., Servicing, inspection, troubleshooting, repairing, modifying, removal/installation, etc.).

Acceptable Experience

3. Experience

Experience is knowledge or skill gained in doing a particular job or activity, which has been developed because that job or activity has been carried out for period.

3.1 Duration

A recording of a total of 180 tasks at different dates in the 2 years period would be the minimum expected record to demonstrate the "duration" requirement (but not necessarily the "nature of experience" requirement, which shall meet the criteria of the following chapter).

The 180 tasks may be replaced by a record of 100 working days of maintenance experience in accordance with the privileges. In this case each recorded day is intended to be a full working day, which for example means for base maintenance activity around 7/8 working hours per day. The duration should be recorded in days or half-days.

A person may have, at the same time one or more UK Part-145 C/S - S/S individual authorisations (i.e., being B1 aircraft C/S on 3 different A/C types or being at the same time C6 and C14 C/S on different components P/N, etc.). They will have to record a minimum of 180 tasks (or 100 working days), regardless of the number/types of UK Part-145 C/S - S/S individual authorisation holds.

For any Ax, Bx, Cx rating¹, a maximum of 20% of the required experience duration, may be replaced by the following activities when relevant to the scope of the UK Part-145 C/S - S/S individual authorisation:

- Maintenance training as an instructor/assessor.
- Maintenance technical support/engineering.
- Maintenance management/planning.

Having recorded 180 tasks or 100 days only during the first year of the 2-year period cannot be considered as acceptable. The experience shall be spread over the period to avoid a too long interval without activity.

¹ D rating experience requirements are detailed in EN4179

3.2 Nature

The activities considered relevant for maintenance experience as applicable to the UK CAA Part-145 C/S - S/S individual authorisation held are functional/operational test, service and ground handling, removal/installation, minimum equipment list, trouble shooting, modification, repair, and inspection.

The tasks recorded need to be representative of the nature of the experience by:

- Complexity
- Diversity.
- being representative of each of the UK CAA Part-145 C/S S/S individual authorisation holds according to the criteria stated in the following chapter.
- Not limited to simple tasks i.e., a bulb replacement for an aircraft B2 C/S, or wheel exchange for an aircraft B1 C/S, etc.

In addition, having recorded a majority of identical tasks or tasks not covering the overall individual authorisation privileges cannot be considered as acceptable. For instance, a Component C/S authorised to release under the C14 rating wheels, brakes and landing gears, should demonstrate experience on wheels, brakes and landing gears to keep the full C14 scope of authorisation.

To demonstrate compliance of the above requirements, the maintenance organisation's quality system is requested to issue a document or to have an electronic system in place that may be accessed.

3.2.1 Aircraft Certifying Staff / Support Staff

The following specific criteria, shall be considered, to identify an acceptable nature of experience:

- For category A, the experience shall include exercising the privileges, by means of actually performing tasks related to the authorisation (hold or intended to be granted) on at least one aircraft type for each subcategory (i.e., A1, A2, A3, A4). This means tasks as mentioned in AMC 145.A.30(g), including servicing, component changes and simple defect rectifications.
- For category B1, B2 and B3, for every aircraft type rating included in the authorisation (hold or intended to be granted), the experience shall be on that aircraft or on a "similar aircraft" within the same subcategory (i.e., B1.1, B1.2, B1.3, B1.4).
- To ensure the experience is representative of the B2 qualification when granting an initial authorisation to B2 category, only the avionics/electrical tasks that cannot be done by a B1 (e.g., replacing bulbs and lights) should be recorded as B2.

- For category C, the experience shall cover at least one of the aircraft types endorsed in the authorisation (hold or intended to be granted).
- For a combination of categories (i.e., B1.1 + B2, B1.1 + C, etc.), the experience shall include some activities in each category (held or intended to be granted).

When the organisation is using the privilege of "similar aircraft" as described in chapter 2 of this user guide a minimum of 30% of the experience duration (tasks or working days as applicable) needs to be recorded for each group of similar aircraft identified in the MOE 3.4.

3.2.2 Component, Engines, Specialised Services Certifying Staff

The following specific criteria, shall be taken into account, to identify an acceptable nature of experience:

- Cx rating (from C1 to C22), Components certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the C rating authorised/intended to be authorised.
- Bx rating (B1, B2 or B3), Engines certifying staff: the experience shall include exercising the privileges, by means of performing tasks or exercising the certification privileges of the authorization on each of the B rating authorised/intended to be authorised.
- D1 rating²

² D rating experience requirements are detailed in EN4179

3.3 Credit of Experience

For an initial UK Part-145 C/S - S/S individual authorisation, the following credit of experience requirements may be considered:

- For Ax rating C/S and S/S: having passed a type training (theoretical and practical) in an approved UK Part-147 organisation within the year preceding the issue of the UK Part-145 C/S-S/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience on the specific aircraft type plus any other similar aircraft.
- For Cx rating CC/S: having passed component training within the year preceding the issue of the UK Part-145 C/S individual authorisation supersedes the need for Demonstration of 6/24 months maintenance experience for this particular component or a component from the same family and same technology.
- For Bx rating CC/S: having passed an engine/APU training within the year preceding the issue or of the UK Part-145 C/S individual authorisation supersedes the need for demonstration of 6/24 months maintenance experience for this particular engine/APU or an engine/APU from the same family and same technology.

➢ For D1 rating³

³ D rating experience requirements are detailed in EN4179

3.4 Lack of recent experience

In the case where it is not possible to demonstrate by records the duration and/or nature of experience according to the criteria established in this document, the UK Part-145 C/S - S/S individual authorisation cannot be granted or renewed, unless the candidate C/S and/or S/S:

- (a) Acquires the missing elements of duration (i.e., missing number or tasks or missing days) and/or nature (i.e., missing T/S or MEL tasks for a B1 aircraft maintenance certifying staff, missing tasks on landing gears maintenance for C14 C/S, etc.) of experience. If the UK Part-145 AMO is unable to provide this possibility due to missing workload/activity, it may be acceptable that the person completes such missing elements. The missing elements may be completed by the UK Part-145 AMO issuing/renewing the UK Part-145 C/S S/S individual authorisation or at another UK Part-145 AMO.
- (b) Attends a complete aircraft type training or component/ engine/APU training according to the previous chapter "Credit of experience. However, in the case of the renewal of the UK Part-145 C/S S/S individual authorisation, *this option cannot be used as a standard mean to replace* experience demonstration but should only be used under extraordinary circumstances such as "a person coming from a period of inactivity", "a maintenance organisation having no maintenance workload for a period of time", "etc."; in fact, the preferred solution in case of lack of recent experience should be always to acquire the missing part according to the previous point (a)⁴;
- (c) Limited to the case of an Ax rated maintenance organisation, with a scope of work limited to minor line maintenance such as for example transit, daily, weekly. Depending on the amount of activity carried out by the maintenance organisation, it may be difficult for each of the line maintenance C/S to demonstrate the necessary "nature" of experience covering the full privileges. In such case it may be accepted, that the UK Part-145 C/S individual authorisation is issued or renewed as applicable, introducing limitations relevant to the missing nature of experience (i.e., authorisation excluding defects rectification, etc..). Such limitation may be removed by complying with the point (a) or (b) above, as necessary.

In any case a proportionate approach should be considered, considering the duration of 'lost time'.

⁴ UK CAA Approval should be sought via the allocated Surveyor when considering this

Typical considerations should be:

Periods between 1 to 6 months – Supervised on job assessment of individual and normal competency assessment, confirm acceptable level of competency and therefore accept recency extension (this should be agreed with the allocated Surveyor)

Periods 6 to 24 months – Cat 'C' / Gen Fam Part 147 course, including:

supervised on job assessment of individual and normal competency assessment

Period of work experience on type to confirm acceptable level of competency and therefore accept recency extension (this should be agreed with the allocated Surveyor).

Periods of 24 months or Greater – B1 or B2 full Type course (including practical training) (since the last time individual has worked on aircraft in a similar category). (This should be agreed with the allocated Surveyor and retained on employees file).

Recording of Experience

4.1 Individual Logbook

The compliance of the 6/24 months maintenance experience requirement shall be documented in an appropriate manner to demonstrate that both the "duration" and "nature of experience" meet the required standard.

A standard template for recording the maintenance experience is provided in CAP 741

The experience may be recorded/ documented in any other individual logbook or recording system (which may be an automated one).

Tasks should be representative consist of the following⁵:

- Routine tasks i.e AMM inspections
- Troubleshooting
- Defect rectification
- Accomplishment of AD's / SB's
- Modifications implementation
- Use of MEL / CDL
- Damage repair & assessment / Use of SRM (Metal & Composite, where applicable)

The final decision to accept such a system, considering the above-mentioned guidance material is the responsibility of the assigned AW Surveyor.

⁵ List not exhaustive, other experience may be acceptable

APPENDIX A Abbreviations

| Abbreviations | | |
|---------------|-----------------------------------|--|
| UK CAA | UK Civil Aviation Authority | |
| AW Surveyor | Airworthiness Surveyor | |
| CS | Certifying Staff | |
| SS | Support Staff | |
| MEL | Minimum equipment list | |
| САР | Civil Aviation Publication | |
| АМО | Aircraft Maintenance Organisation | |
| АММ | Aircraft Maintenance Manual | |
| AD | Airworthiness Directive | |
| SB | Service Bulletin | |
| CDL | Configuration Deviation List | |
| SRM | Structural Repair Manual | |
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