

Contribution ID: 56da4b8a-dc60-4eb2-9202-d1872644d961

Date: 13/07/2018 22:31:49

# Consultation for PIA Maintenance to support EPAS 2019-2023

Fields marked with \* are mandatory.

---

## Introduction

---

Dear Madam, Dear Sir,

You received an email to provide comments on a Preliminary Impact Assessment report. This is a key step in the programming process to gather information on the programming priorities for the European Plan for Aviation Safety (EPAS) cycle.

**Please provide your comments, if any, by: 13 July 2018.**

For any issues, please contact [impact.assessment@easa.europa.eu](mailto:impact.assessment@easa.europa.eu)

Best regards

Gilles Gardiol

Senior Impact Assessment Officer

---

## How to provide your comments

---

**1. Open the PIA report on the upper right side of the window**

PIA consultation per PIA

Fields marked with \* are mandatory.

**Introduction**

Dear Madam, Dear Sir,

You received an email to provide comments on Preliminary Impact Assessment. This is a key step in the programming process to gather information on the programming priorities for the next RMP-EPAS cycle.

For any issues, please contact [impact.assessment@easa.europa.eu](mailto:impact.assessment@easa.europa.eu)

Best regards

Gilles Gardiol

Senior Economic Advisor

**How to provide your comments**

1. Open the PIA report on the upper right side of the window

**Click here**

**Languages**  
[EN] English

**Background Documents**  
[pia\\_rotorcrafft\\_v15\\_consultation.pdf](#)

**Contact**  
[impact.assessment@easa.europa.eu](mailto:impact.assessment@easa.europa.eu)

[Download PDF version](#)

**2. Use the line number on the left part of the document to indicate from which line starts your comment**



**European Aviation Safety Agency**

**Preliminary Impact Assessment**

1  
2  
3  
4  
5  
**6**  
7  
8  
9  
10  
11  
12  
13  
14  
15

**Use this number for commenting**

**1 What is the issue/rationale?**

**Rotorcraft**  
version 15 – Feb 2017  
Executive Summary

This Preliminary Impact Assessment (PIA) for Rotorcraft has been developed in order to determine the appropriate actions that the Agency should take to address existing and potential future safety issues that arise from the operation of rotorcraft.

A key input to the PIA Rotorcraft process was the provision of the Safety Risk Portfolio for Rotorcraft which provides a list of the main safety issues based on accident and occurrence data from the last 10-15 years along with inputs from the industry. Safety Risk Portfolio for Rotorcraft is in a format that can be quickly assimilated and interpreted by the reviewer. The Safety Risk Portfolio for Rotorcraft directly links the Key Risk Areas (i.e aircraft upset, terrain/obstacle conflict) to the underlying safety issues that could cause them (i.e Flight Crew Perception and Awareness, Decision Making and Planning, Operation in Adverse Weather

**3. We advise to save your answer by clicking on "get pdf file" after submission of your answer**

**Contact information**

\* Your organisation

European Aviation Maintenance Training Committee (EAMTC)

\* Your Name

Hans Mayer

\* Your email address

president@eamtc.org

\*Please select the Advisory Body you are member of (multiple choice)

- MAB
- TeB ADR
- TeB ATM/ANS
- TeB Air Crew
- TeB Air Ops
- TeB GA
- TeB P&CA
- TeB SM
- SAB
- ADR TEC
- ATM/ANS TEC
- D&M TEC
- E&M TEC
- FS TEC
- Commercial Airplane Safety committee
- Certification committee
- Drones committee
- GA sectorial committee
- Rotorcraft sectorial committee

---

## Any comments?

---

Do you have comments to provide for this PIA?

- Yes
- No

---

## Comment 1

---

Line number

42

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Mutual recognition of OJT, Type rating Training and course directly approval by an EASA MS is strongly recommended.

Reason: Because we are working on regulation base there is no need to do the same job twice! There is no added value for safety, it is just wasting NAA resources.

---

## Comment 2

---

Line number

46

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Reduction of number of categories/subcategories is strongly recommend, e.g. drop cat A, B3 and C; create a common Cat B as a basic licence without type rating (Module 1-10 must be adjusted) B1 including subgroups and B2 specialisation comes afterwards

Reason: getting better, broader and faster basic skills to work in aviation. Allow specialisation after experience has been gained in a 145 environment. Employers identify and assess talents better. Adding a B2 to a B1 or vice versa becomes easier (syllabus adjustment is required).

---

## Comment 3

---

Line number

48

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Additional AML categories like cabin or airframe repairs are not required and useful.

Reason: the just add complexity without improving the safety, work related to this tasks depends on TCH requirements and company authorisation (nevertheless basic Training is need and will be commented later)

---

## Comment 4

---

Line number

72

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Action 1.1: No study recommended/needed  
Reason: Taking the technological innovation and the demand of up to date adequate qualified maintenance personal for a safe operation into consideration the needed simplification and update am cat is obvious. A further study would delay the process unnecessary

---

## Comment 5

---

Line number

102

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Question 1: The object of these question concerns more the NAA, however we are all in favour of a simplification of Part 66 AML categories/subcategories, e.g. the exception of merging B1 and B2 categories and EAMTC working groups are in standby to support EASA.  
Motto as we are used to say for flight safety : « Don't forget to KISS \* » (\*Keep it Safe and Simple).

---

## Comment 6

---

Line number

104

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Question 2: Implementation time of 4 years, from TOR to Commission IR s hall be realised, RMT start in 2018 without further delay needed, EAMTC is ready to support

## Comment 7

---

Line number

105

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Question 3: Yes!

---

## Comment 8

---

Line number

142

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

All of these objectives are strongly supported! In accordance with the RMT 0.281 New teaching technologies 2400 hours requirement should be dropped for the theoretical part in favour of "contents covered"  
Reason: The objectives are overdue for a long time already and technology moves fast, so the gap between the qualification provided and competency needed opens more and more.

---

## Comment 9

---

Line number

150

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Great Objective! Urgently needed to be executed.

## Comment 10

---

Line number

152

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

RMT Action 2.1 is overdue and highly needed. All following topics are strongly supported by EAMTC, but might be not complete (Working group needs to analyse during the RMT process).

## Comment 11

---

Line number

153

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Line 153 to 177 may miss some important topics and the working group needs to analyse during the RMT process the list

## Comment 12

---

Line number

178

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Objective is strongly supported by EAMTC

## Comment 13

---

Line number

179

#### Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

The RMT Action 2.2 is strongly supported!  
Reason: The objectives are overdue for a long time already and technology moves fast, so the gap between the qualification provided and competency needed opens more and more (Details see comment for line 46)  
RMT.0281 New training/teaching technologies is also needed and could show possible CBT ways in relation to topics already  
There is also the necessity to train the Part-145 supervisors for the assessment of competences and the Part-147 instructors providing practical training. A method in the form of GM could be included in Part-66 and useable in Part 145/147, e.g., « Guidelines and Recommendations on Assessments GR 1001 » from EAMTC

---

## Comment 14

---

#### Line number

186

#### Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

The RMT Action 2.3 is strongly supported in addition to RMT Action 2.2. We recommend a final practical competency examination taking behaviour in consideration and not attitude! This must be mandatory if only approved examinations have been passed instead of an approved basic course under 147.  
Reason: The objectives are overdue for a long time already and technology moves fast, so the gap between the qualification provided and competency needed opens more and more (Details see comment for line 46)

---

## Comment 15

---

#### Line number

193

#### Your comments



**3,000 character(s) maximum**

(including reasoning to propose a change)

Action 2.4: An apprenticeship is under the national educational system and not under the EASA regulations (wrong term). In addition today either there is either a practical training period in a Part-145 AMO as a partnership with the AMTO or the AMTO has made the provision to carry out practical training during the basic training part. Nevertheless we shall not create another administrative burden for an AML applicant, instead of this we must strengthen the need to gain competency by all possible means and proof this with the an AML Logbook and with competency assessments.

---

## Comment 16

---

Line number

197

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Strongly supported  
Reason: Database supports transparency and therefore quality and safety

---

## Comment 17

---

Line number

199

Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Strongly supported  
Reason: EASA standardized digital version needed

---

## Comment 18

---

Line number

203

#### Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Strongly supported!  
Reason: long overdue, actual content is outdated, adjustments must follow technological development

---

## Comment 19

#### Line number

208

#### Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

Meaning and outcome is unclear. Define "performance based way" and "high level goals" and describe examples as well in the rulemaking action.

---

## Comment 20

#### Line number

217

#### Your comments

**3,000 character(s) maximum**

(including reasoning to propose a change)

EAMTC is in favour of all the actions as a RMT as mainly the Part-147, Part-66 and partly Part-145 rule structure needs to be reworked

### If you want to provide more comments:

- submit your 20 comments by clicking below on "Submit"
- reopen the weblink and add new comments.
- repeat this operation as many times as necessary

## Any other comments

---

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

This feedback comes European Aviation Maintenance Training Committee. A pan-“EASA world” industry Foundation dedicated to maintenance training. We are a culturally diverse organisation were more than 100 members, Manufacturers, Airlines, AMO, ATMO and other training organisations share mutual goals to improve safety through training. We are willing to cooperate with EASA in any possible way and have experience being active in different rulemaking tasks in the past. We have already prepared standards in Guidelines and recommendations documents and a broad competency due to our members in the aviation training industry. There will be more comments after this first sending.

### Background Documents

20180514\_Letter\_PIA\_consultation.pdf

PIA\_Maintenance\_Issue\_2\_for\_consultation.pdf

---

### Contact

impact.assessment@easa.europa.eu

---