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Date: 13/07/2018 22:50:11

# Consultation for PIA Maintenance to support EPAS 2019-2023

Fields marked with \* are mandatory.

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## Introduction

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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

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## How to provide your comments

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**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\\_rotorcraft\\_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** 1 What is the issue/rationale?  
7 This Preliminary Impact Assessment (PIA) for Rotorcraft has been developed in order to determine the  
8 appropriate actions that the Agency should take to address existing and potential future safety issues that  
9 arise from the operation of rotorcraft.  
10 A key input to the PIA Rotorcraft process was the provision of the Safety Risk Portfolio for Rotorcraft which  
11 provides a list of the main safety issues based on accident and occurrence data from the last 10-15 years  
12 along with inputs from the industry. Safety Risk Portfolio for Rotorcraft is in a format that can be quickly  
13 assimilated and interpreted by the reviewer. The Safety Risk Portfolio for Rotorcraft directly links the Key Risk  
14 Areas (i.e aircraft upset, terrain/obstacle conflict) to the underlying safety issues that could cause them (i.e  
15 Flight Crew Perception and Awareness. Decision Making and Planning. Operation in Adverse Weather

**Use this number for commenting**

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

**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

\* 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

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## Any comments?

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Do you have comments to provide for this PIA?

- Yes
- No

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## Comment 1

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Line number

272

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Action 2.2 and 2.3 + 2.5 benefit level is ok  
Action 2.4 we do not support  
Action 2.6 shall be raised significantly  
Reason: Details see comments for lines 193, 197, 199 and 203+204

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## Comment 2

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Line number

275

Your comments

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

(including reasoning to propose a change)

Question 6: Details see comments for line 272

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## Comment 3

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Line number

277

Your comments

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

(including reasoning to propose a change)

Question 7: No  
Reason: see comments for line 272

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## Comment 4

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Line number

280

Your comments

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

(including reasoning to propose a change)

Action 2.2 RMT must also focus on replacing "2400 hours" requirement and implement the requirement of achievable learning goal and defined competencies as a reference.

Action 2.3 RMT is requested in addition to Action 2.2 (Details see comment for line 186)

Action 2.4 we do not support at all

Action 2.5 is good

Action 2.6 RMT is indispensable and shall include the urgently needed implementation of the RMT 0.281 results

Implementation time of 4 yes its good and shall be realised without delay

Transition time is generally recommended because organisations as well as individuals need adaption time to new requirements

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## Comment 5

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Line number

283

Your comments

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

(including reasoning to propose a change)

Question 8 + 9: Details see comments for line 280

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## Comment 6

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Line number

294

Your comments

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

(including reasoning to propose a change)

The suggestion that increased cost can be transferred to the student is absurd and shows a lack understanding of the current way Part-147 Basic training is organised and financed. Today the whole system with 2400 hours is either financed in a public educational concept or with big MRO in connection with 147-schools. Almost no student is able to pay commercial prices for a 2400 hours course program and higher cost would increase the lack of needed workforce in aviation maintenance.

## Comment 7

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Line number

331

Your comments

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

(including reasoning to propose a change)

When Action 2.4 is dropped no ICL needs to assigned and capacity can be used for the important tasks  
Action 2.6 ICL shall be raised to 5  
Reason: It is expected that more frequently the syllabus need to be adjusted, as well as changes of learning material and equipment for Part-147 AMTO will occur in the future

## Comment 8

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Line number

337

Your comments

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

(including reasoning to propose a change)

Question 10: The essential part of the assessment is being carried out by the Part-145 AMO during the experience recording period before granting an company authorization, as a result of this the costs for the Part-147 AMTO will be limited to the competence assessment during practical parts. This corresponds more to a reinforcement of what exists already.

## Comment 9

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Line number

339

Your comments

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

(including reasoning to propose a change)

Question 11: The essential part of the assessment being carried out by the Part-145 AMO during the recording period of experience, costs are expected rather 7 than 8. This requires supervisors and assessors to be designed and trained (possibility of using the supervisors declared with in the framework of the OJT for the first TRT).

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## Comment 10

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Line number

343

Your comments

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

(including reasoning to propose a change)

Question 12: No, we disagree because we need both actions to be executed! (Details see comment for line 186)

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## Comment 11

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Line number

345

Your comments

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

(including reasoning to propose a change)

Question 13: No support for that activity (Details see comment for line 193)

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## Comment 12

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Line number

346

Your comments

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

(including reasoning to propose a change)

Question 14: This question is not really matching the activity which is needed for AML data transparency. We are sure that daily work at the competent authorities can be optimized with a standardized EASA application to issue and amend AMLs

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## Comment 13

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Line number

348

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Question 15: Agree

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## Comment 14

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Line number

354

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Action 2.6 shall be rated Priority Type "A" as it is safety relevant, the Start and Implementation time shall not exceed a maximum of 5 years.

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## Comment 15

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Line number

387

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)



No to the objective as a regulation

Reason for No: No additional administrative burden for the Part-147 AMT O, they already need to link their practical type training element to their theoretical type training element in order to get it approved.

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## Comment 16

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Line number

388

Your comments

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

(including reasoning to propose a change)

RMT Action 3.1 Practical Type Training Element: Criteria and the reference table to select practical training tasks needs to be reworked and updated but no additional TNA regulation for the practical element of the type training

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## Comment 17

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Line number

394

Your comments

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

(including reasoning to propose a change)

lines 394 till 405: RMT action 3.2 the solution to individually tailored type training for the competent student seems a good idea but requests a totally new setup and environment in maintenance training. This RMT shall not be started until the competency based training for maintenance staff is defined. In addition it is unclear how a Part-147 AMTO and the teacher have to manage and deliver CBT training programs in order to bring all students to the defined level of competence. Formally competence evaluation should already be in place during the practical training as part of the Type Training, and practical assessments are done already. Enforcing and standardisation of current requirements are an option as well to improve practical exercises and assessments during type training (again RMT.0281 New training/teaching technologies is also needed and could show possible ways already).

## Comment 18

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Line number

407

Your comments

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

(including reasoning to propose a change)

Objective agreed

## Comment 19

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Line number

408

Your comments

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

(including reasoning to propose a change)

lines 408 till 413: RMT Action 3.3 shall define clear language proficiency levels to assure level playing field. It is recommended to use international defined language standards that Part-147 AMTO need not to create something by themselves as well as the language capability may also be checked from an independent organisation as an option not to load additional burden outside their field of competency on the Part-147. In type training aircraft manufacturer language of the documentation is also an important issue and a language proficiency level must be assured by the students in order to achieve the learning objectives.

## Comment 20

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Line number

415

Your comments

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

(including reasoning to propose a change)

Objective agreed

**If you want to provide more comments:**

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

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**Any other comments**

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Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

2. EAMTC Comment

**Background Documents**

20180514\_Letter\_PIA\_consultation.pdf

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

**Contact**

impact.assessment@easa.europa.eu