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Date: 13/07/2018 23:06:29

# 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)

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**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

**Use this number for commenting**

6 **1 What is the issue/rationale?**

7 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.

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10 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

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**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

417

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

RMT Action 3.4 is welcome and needed. It shall be assured that it is the responsibility of the aircraft/system manufacturer to provide the OSD data as a base for the difference training.

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## Comment 2

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Line number

427

Your comments

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

(including reasoning to propose a change)

Question 16:

- see line 387 + 388-390
- see line 394-405
- see line 408-413

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 a 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.

- see line 417-420

RMT Action 3.4 is welcome and needed. It shall be assured that it is the responsibility of the aircraft/system manufacturer to provide the OSD data as a base for the difference training.

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## Comment 3

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Line number

429

Your comments

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

(including reasoning to propose a change)

Question 17:

Generally RMT should be used.

In the meantime FOT on current practical training and assessment could increase the required standard as well for Action 3.2

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## Comment 4

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Line number

480

Your comments

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

(including reasoning to propose a change)

Question 18:

Action 3.1 = no, Reasons see comments line 387 + 388-390

Action 3.2 = no, Reasons see comments line 394-405

Action 3.3 = yes

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## Comment 5

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Line number

482

Your comments

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

(including reasoning to propose a change)

Question 19: no objections

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## Comment 6

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Line number

488

Your comments

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

(including reasoning to propose a change)

Question 20 + 21:

Action 3.1 and 3.2: 1 year is too short for the transition period.

Reason: These tasks are needed to be taken on by existing staff and the changes have a huge impact on the operation of an AMTO. After final rule in place we assume 2-3 years for implementation is needed.

Action 3.3: RMT - 4 years seems too long.

Reason: Please "don't re-invent the wheel" and use existing standards for language proficiency assurance.

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## Comment 7

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Line number

524

Your comments

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

(including reasoning to propose a change)

Question 22:

Action 3.1 and 3.2 are huge tasks for an AMTO. ICL should be raised to 8

Action 3.3 = ok

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## Comment 8

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Line number

527

Your comments

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

(including reasoning to propose a change)

Action 3.3 shall be rated Priority Type "A" as it is safety relevant, the Start and Implementation time shall be significantly shorter than 4 years.

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## Comment 9

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Line number

583

#### Your comments

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

(including reasoning to propose a change)

Question 23 (a):

Action 4.1: we support the use of special company authorisation of Part-145 organisation instead of endorsing the type rating in the AML; in reference to line 570ff: in this context it would become essential to define:

- the requirements of the assessor requested to check that staff has an adequate understanding of the legacy aircraft to be maintained together with the associated organisation procedures;
- evaluate possible alleviation for legacy certifying staff with regards to experience requirement in 145.A.35(c) accepting the option to use similar technology aircraft to fulfil the requirement.

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## Comment 10

#### Line number

583

#### Your comments

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

(including reasoning to propose a change)

Question 23 (b):

Acton 4.2: we strongly support the mutual recognition of direct approvals procedures for type rating courses of legacy aircraft.

REASON (see also line 576): mutual recognition is required to be consistent with the article 2 point 2b of the Regulation EC 216/2008 (it should be followed by all Member States).

To fulfil the part-66.B.130, direct approval procedure, the Part 145 organisations may sub-contract a Part-147 organisation with competencies about similar technology aircraft type to assist them to develop type training in accordance with Part-66 appendix III.

REASON: Part-145 organisations need CS trained for the continuing airworthiness of legacy aircraft and a Part-147 organisation has the competences to develop type training.

Also in this case it would be beneficial to better detail and specify definition of similar technology aircraft

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## Comment 11

Line number

585

Your comments

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

(including reasoning to propose a change)

Question 24: we agree that actions 4.1 and 4.2 must be implemented as a RMT.

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## Comment 12

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Line number

587

Your comments

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

(including reasoning to propose a change)

Question 25: we agree that a list of legacy aircraft has to be defined into the Appendix I to the AMCs Part-66 such as the aircraft Groups list (i.e. list of legacy aircraft could be, but not limited to, the following aircraft: Fokker F27, Jetstream 3100/3200, 737 classic, , A300-600, A310, B747-200, MD11, B707, B727, etc...)

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## Comment 13

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Line number

613

Your comments

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

(including reasoning to propose a change)

Question 26:  
the benefit justification of action 4.1 is accepted.  
the benefit justification of action 4.2 is not adequate: mutual recognition among EASA MS would generate significant costs reduction, increase availability of legacy training and facilitate free movement of persons and services that will generate very high benefit.



## Comment 14

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Line number

614

Your comments

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

(including reasoning to propose a change)

Question 27:  
the level of benefit of action 4.1 is agreed at 7.  
considering Q26, the level of benefit of action 4.2 should be 9.

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## Comment 15

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Line number

620

Your comments

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

(including reasoning to propose a change)

Question 28: no transition period required; the sooner the better.

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## Comment 16

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Line number

646

Your comments

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

(including reasoning to propose a change)

Question 29:  
for action 4.1 ICL should be lowered to 3-4, as part 145 have internal qualification & authorization system in place and this new legacy aircraft could be added easily. Procedure needs to be updated and adapting to the internal authorisation, a short workload is expected (depending to the size and complexity of Part-145 organisation) to update current procedure and to adapt internal system but impact does not look significant in comparison with consequent benefits.

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## Comment 17

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Line number

660

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

There are more problems as described here:

- The "Appendix II - Aircraft Type Practical Experience and On-the-Job Training - List of Tasks" as base for the OJT is not adequate for CMPA
- The requirement that OJT should cover at least 50% of these tasks contained in Appendix II to AMC to Part-66 is not adequate for today's technology and AML categories. We suggest instead to use a OJT program based on volume and distribution of the types of task rather than a list of defined tasks to be carried out. In this program the number of tasks corresponds to the level of the theoretical type training and AML categories privileges. This solution enables the carrying out of the OJT on line and/or base from a general logbook (EAMTC has a working group on that subject who is likely to cooperate with EASA).
- a mutual recognition of an approved OJT standard must be assured between MS, e.g. one Part-145 AMO employee a person whose AML is issued in a different MS as the 145 approval, here already problems occur for the AML holder to fulfil the requirements of two different MS

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## Comment 18

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Line number

725

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

## Question 31:

RMT Action 5.1 the splitting of the OJT in two modules is not supported  
Reason: Identifying «line» and «base» modules doesn't respond to the difficulty of carrying out certain tasks according to the sector of activity. I brings no flexibility but an additional burden and increased complication/trouble for the AML applicant and the company

RMT Action 5.2 this will lead to an AML without type rating and a wide variation of qualification standards. In this case OJT can be dropped totally and only AMO authorisation counts. When there is no standard and mutual recognition than each AMO must start new with an AML holder when hiring. This don't support neither safe operation nor economical aspects - not supported.

RMT Action 5.3 ask for complete re-definition of the regulation for OJT to assure Part-145 AMO and Part-147 AMTO cooperation is possible and feasible. To assure a level playing field together with a high training standard 145 and 147 roles and responsibilities must be clearly defined. I should be made possible that an AMO or an AMTO can also work on its own if the OJT conditions are fulfilled. The need and value of an operative aircraft for conducting an OJT should be questioned must be re-examined.

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## Comment 19

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## Line number

## Your comments

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

(including reasoning to propose a change)

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## Comment 20

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## Line number

## Your comments

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

(including reasoning to propose a change)

Question 33: The calculation of the BL is based on wrong assumptions and cannot be agreed. If OJT is updated and more flexible the BL will be 7 or even higher.

**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)

3rd EAMTC Comment

**Background Documents**

20180514\_Letter\_PIA\_consultation.pdf

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

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**Contact**

impact.assessment@easa.europa.eu

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