

Contribution ID: 8c0e8777-d82e-482c-bed2-cfd559dccf7b

Date: 13/07/2018 23:37:17

# 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\\_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**  
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

\* 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

775

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Question 34: See answer to question 33

---

## Comment 2

---

Line number

782

Your comments

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

(including reasoning to propose a change)

Question 35: A transition period of 2 year after final law seems to be appropriate

---

## Comment 3

---

Line number

836

Your comments

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

(including reasoning to propose a change)

Question 36: Despite the wrong assumptions ICL agreed

---

## Comment 4

---

Line number

849

Your comments

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

(including reasoning to propose a change)

EAMTC opposes the statement "the likelihood of fraud or cheating is widely acknowledged"! There is no evidence. The whistle-blower cause a lot of work without proving their complaints. Whistle-blower shall only be accepted they provide evidence and means of contacts in order to verify the complaint and clarify questions.

---

## Comment 5

---

Line number

851

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

When we take the amount of examinations conducted only among out member s without trouble into consideration we wonder what is the data base fo r such drastic decisions?

---

## Comment 6

---

Line number

925

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

Question 37  
RMT action 6.1 is not agreed  
Reasons: The suggested solution has huge elements for misunderstanding the Part-147 and Part-66 and current practice. Most students only perform theoretical examinations at a Part-147. Their practical skills are not assessed by a Part-147 or NAA, they only need to show experience but no practical assessment. This is the main reason that MRO's complains. But in order to assure competency after the training a final practical assessment shall be mandatory for all engineers applying for an AML! With this RMT a few issues might occur: how could MS be qualified to assess students in basic and type rating training? What is an adequate knowledge level? Standardized MS-wide training material is mandatory for this task in order to assure level playing field and success at the end of the training ...  
RMT action 6.2 and 6.3 is not agreed  
Reason: As long as there is no standardized European aviation language and training material this ECQB makes not sense. Anyway we need competent maintenance staff which means not only knowledge but also a successful practical assessment which shows also the behaviour during the performance.  
FOT Action 6.4 fully agreed and supported  
SPT Action 6.5 fully agreed and supported

---

## Comment 7

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 8

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 9

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 10

---

Line number

992

Your comments

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

(including reasoning to propose a change)

Question 41: Action 6.1, 6.2, 6.3 please skip from your RMT list  
Action 6.4 and SPT please start as soon as possible, we are ready to participate

---

## Comment 11

---

Line number

994

Your comments

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

(including reasoning to propose a change)

Question 42: Action 6.4 and SPT please start as soon as possible, we are ready to participate

---

## Comment 12

---

Line number

1062

Your comments

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

(including reasoning to propose a change)

Question 43:  
Action 6.1 seems extremely costly (NAA training, independency of the NAA inspector meaning employed by the NAA). Cost level should be 7 at least. We assume that the best solution is that current Part-147 AMTO shall carry out the assessments on the non full training students, the cost for implementing is minimal.  
Action 6.2 and 6.3 the amount of questions seems too low as a minimum of 3 times the questions is needed for a B1.1: 692 questions (per B1.1) \* 3 = 2076 seems bear minimum for a question data database, therefore cost will be significantly higher

---

## Comment 13

---

Line number

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

---

## Comment 14

---

Line number

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

---

## Comment 15

---

Line number

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

---

## Comment 16

---

Line number

Your comments



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

(including reasoning to propose a change)

---

## Comment 17

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 18

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 19

---

Line number

Your comments

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

(including reasoning to propose a change)

---

## Comment 20

---

Line number

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

**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

---

## Any other comments

---

Your comments

*3,000 character(s) maximum*

(including reasoning to propose a change)

## Background Documents

20180514\_Letter\_PIA\_consultation.pdf

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

---

## Contact

impact.assessment@easa.europa.eu

---