

Notice of Proposed Amendment 2018-11

*Certification Specification and Guidance Material for maintenance certifying staff type rating training
RMT-106 (21.039E)*

EAMTC Feedback

Page 4 Point 2.1 and 2.2

EAMTC agrees with EASA and strongly supports the need for the minimum syllabus of maintenance certifying staff type rating training, including the determination of type rating as the basis for the development and approval of a Part-66 type rating course.

EAMTC also strongly recommends a balanced OSD option in order to empower all stakeholders, TCH and AMTO, to cooperate closely to provide training in reference to best technical content and up to date didactics for the benefit of the maintenance certifying staff and therefore operational safety.

Page 13 OSD Box Concept Diagram

EAMTC welcomes the clear concept.

Page 17 CS MCSD.420 Minimum list of practical tasks

EAMTC supports the concept of the minimum list of practical tasks. Nevertheless the tasks must be accompanied by a clear teaching point / training objective with reference to the aircraft and systems but not limited to an execution with mandatory training devices set by the TCH.

Page 38 Safety Impact: Option 2

EAMTC fully supports Option 2 "Balanced OSD" as the best possible way to improve quality and therefore safety in training.

Page 38 Safety Impact: Option 3

EAMTC disagrees with the opinion of a high positive impact for this option because this rigid way would leave no room for AMTO to contribute with their experience in training for the benefit of safety. AMTO are naturally closely linked with operators participating from their experience. In addition their daily work with certifying staff as students in a pedagogical context is a valuable platform to continuously improve training quality. Being limited to a given "must use" full type training course from the TCH would create a "one-way street" of training provided with a unhealthy delay when didactical updates are needed.

Therefore, Option 3 is in our understanding with the safety impact lower than Option 2!

Page 38 Economic Impact

EAMTC disagrees with the rating in Option 3 of a high negative impact for the TCH while the Part-147 have easier access to the full type training know how and therefore less costs in implementing the training. Running a set type rating training without being able to utilize own capabilities at its best is also costly as well as it is wasting resources.

Page 39 Comparison of options

EAMTC sees Option 2 “Balanced OSD” as it is shown.

We disagree with the shown rating of the impacts in Option 3 “Large OSD”. As previous described we rate the safety impact with a maximum of “++” while we see the Part-147 AMTO with a rating of “-”.

The economic impact on the Part-147 AMTO in Option 2 is rated “+” therefore, we have to assume that there will not be a substantial fee for purchasing OSD from the TCH. If this is not the case and charges are left to the TCH’s, economic restraints of some independant AMTO’s may most defenitely cause an impact on safety.

Page 39 Monitoring and evaluation

EAMTC welcomes the proposed measures.

In addition we recommend monitoring the feedback from the Part-147 AMTO experts to the applicability of the CS-MCSD in practical use while delivering training for maintenance certifying staff in order to ensure a high level of competence in maintenance.

How to monitor: During the routine audits of the competent authorities in the AMTO

Who should monitor: the competent authority overlooking the AMTO

This evaluation would also be most beneficial for the TCH and EASA in order to continuously improve the process with all criteria’s and in consequence keep the training level at the highest standard for the benefit of all stakeholder, safety and economic.