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<b>Title</b>	Review of Part-66
<b>NPA Number</b>	NPA 2020-12

**European Helicopter Association** (isabella.abbate@eha-heli.eu) has placed **27** unique comments on this NPA:

<b>Cmt:</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
178	(General Comments)	0	<u>General comment</u> Overall there has been a shortage of Part 66 Licensed Engineers and the demographics within the industry suggest that this problem may get worse which has been exacerbated by the current pandemic. We need to consider if the NPA assists in removing some of the existing barriers such as transfer and recognition of approvals and training between member states	
143	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)	10 - 24	<u>AMC.66.B.115</u> The competent authority should accept OJT and the process approved by another competent authority within the EASA member states in order to allow skills to be easily transferred throughout the member states.	
144	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)	10 - 24	<u>66.B.400</u> The credit issued/approved by one member state must be recognised by all other member states in order to create a level playing field for engineers.	
146	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)	10 - 24	<u>66A25</u> How do you assess attitude? This is a very subjective area and can be based on the relationship between the candidate and the assessor. Perhaps some criteria need to be provided in this area	
147	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)	10 - 24	<u>66A25 para B</u> Does this now mean the category B license doesn't now encompass L licenses? Are L licenses now separate?	

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148	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)	10 - 24	<u>66A30 para 5</u> Higher education obtaining approval from the Authority can be expensive and the reason why some Universities haven't applied. If the Authority issued criteria for approval this would reduce the cost of compliance for degree and other higher educational establishments.	
150	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>Annex 3 Appendix 3</u> 6.3.1. General requirements: The OJT shall involve actual task performance on aircraft and components, covering line and base maintenance activities. Not all Maintenance Organisations will be approved for Base Maintenance and to have an engineer at a base maintenance facility for a prolonged period will have significant cost implications for some organisations if they can get access	
161	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 42 45</u> Module 3 has changed its name to ELECTRICS FUNDAMENTALS - does not read well in English.	
162	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 46 48</u> Module 5 has many changes, like some areas are lower knowledge levels for B1. A new element introduced 5.16 Cybersecurity high level concepts - but this element has no examination questions.	
163	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 49</u> Module 6 still includes wooden structures for B1.3 which is strange as there are no wooden structured gas turbine powered helicopters.	

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166	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 52</u> Module 7 contains a new element for 'additive manufacturing' - more commonly known as 3D printing. The intent is to raise awareness of 3D component failure modes, this includes a fairly large number of questions in the exam for this topic. Surely this is more related to Part-21 rather than Part-145?	
168	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 54 56</u> Module 9 has been changed to the same levels across all licences. This is a good idea as the was only a small difference but some NAA's would not accept a pass at A level as a B equivalent	
169	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 58</u> Module 10 includes a blank reference to a regulation (EU)..../.... Referring to security risks in aeronautical information systems. This is probably meant to refer to ED 2020/006/R mainly CS-27 and Part-21 design related	
170	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 34</u> Module 12 has no APU topic, and appears in Module 15 at L2 which is too low compared to fixed wing APU L3.	
171	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 35 128</u> Module 13 still has rotorcraft flight controls under ATA 27 which is fixed wing only. Should read ATA 27/67. This omission appears in multiple locations.	

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172	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 141</u> New re-worded provision for Multimedia based training (MBT) elements but no explanation to show how this should be implemented or what is acceptable.	
173	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 87</u> Essay paper examinations have Module 9 omitted in the description due to removal of 9A and 9B but they have failed to include the new 9 in the description.	
174	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 84</u> Cat A practical task list Table (a) has 17 dedicated tasks but a number are for fixed-wing operators only, (4) Ovens, (9) Toilets, (11) Overhead storage compartments, (14) in-flight entertainment systems. This reduces the availability of tasking for helicopter students by 23%.	
175	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 84</u> Cat B1 practical task list contains bending and flaring of aircraft pipes. Inspection and testing of springs. These tasks are uncommon practices in helicopter maintenance.	
176	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 84</u> It is not made clear what a successful tasking of practical for B1 or B2 would be acceptable to EASA. What are the minimum acceptable tasks?	

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177	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>page 151</u> There is a suggestion that a B1+B2 holder could attend a combined type training course (B1+B2) and complete the basic practical elements to obtain B1 type rating endorsement. After 3 years an endorsement could be applied for in the B2 category, along with the missing B2 practical tasks. This would be problematic as the validity of the original type course certificate of recognition would have expired after 3 years.	
446	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO ANNEX III (PART-66)	25 - 213	<u>AMC to section 6. 6.6 OJT assessment</u> Approved assessment protocol is completely new. Pass/ fail criteria is not well defined The production of a simulated release to service could difficult in a live electronic system.	
149	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO THE AMC TO ANNEX III (PART-66)	214 - 245	<u>Page 229 A2</u> Task abbreviations aren't clearly defined and there is no list of abbreviations	
151	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO THE AMC TO ANNEX III (PART-66)	214 - 245	<u>Annex 3 Appendix 3</u> 6.3.2 Personnel requirements: General comment; The NPA would appear to be treating a Part 145 Maintenance Organisation as if they are a Part 147 Training Organisation, which they are not. These roles as defined would maybe be better incorporated into Part 145.	

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152	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO THE AMC TO ANNEX III (PART-66)	214 - 245	<u>Annex 3 Appendix 3</u> Mentors- Brand new to be specifically approved by Authority (only Form 4 staff are at the moment). This is a *Big change*	
159	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO THE AMC TO ANNEX III (PART-66)	214 - 245	<u>Annex 3 Appendix 3</u> We currently authorise all type-rated authorised engineers and they are not specifically trained as trainers. Small comment: it will be more difficult to manage availability of a mentor over different shift patterns etc.	
160	3. Proposed amendments and rationale in detail   3.1. Draft regulation and draft AMC and GM   ANNEX III (PART-66)   APPENDICES TO THE AMC TO ANNEX III (PART-66)	214 - 245	<u>Annex 3 Appendix 3</u> Assessor needing to be type-rated for three years is new. I am currently the main assessor for CHC Scotia and not type-rated. This will mean that the assessor will be a maintenance engineer and therefore possibly some independence will be lost from this process change. They will require training in examining others which is another cost.	