

❖ NOTICE ❖



TO: ALL MEMBERS

RE: AC 66-08 B1 PRIVILEGES IN AVIONICS SYSTEMS

Earlier this year we became aware that an AMO had told their B1 LAMEs that they could certify for 'any mechanical aspects' of ATA Chapter systems designated B2. The ALAEA and members disagreed with the advice and requested a CASA review. CASA said:

The Civil Aviation Safety Authority (CASA) has reviewed Advisory Circular (AC) 66-08 further and accepts that paragraphs 3.4.2.1 and 3.5.3.2 should not imply or express that a B1 licence holder has privileges for maintenance of any mechanical aspects of a system where Table 1 to paragraph 66.A.20 of the Part 66 Manual of Standards (MOS) is designated B2. CASA is amending the AC to more accurately reflect the content and intent of the MOS to avoid any misinterpretation.

CASA advised us that the AMO had been contacted over the matter. We noticed that the AMO did not amend their advice. The ALAEA conducted a Freedom of Information (FOI) exercise to establish what happened. The information has been released and reveals that:

- The AMO asked CASA if B1's could conduct detailed inspections of pitot probes.
- CASA incorrectly advised the AMO that they could.
- The ALAEA met CASA. CASA agreed that Part 66 does not include inspection privileges for B1 LAMEs in Avionic ATA systems. B1 LAMEs could not conduct detailed inspections of pitot probes. Despite this, they refused to press the matter with the AMO because European regulations were different. They disregarded our claim that we are not Europe.
- On legal advice, CASA directed that the AMO be contacted about the unlawful advice and to ensure they were compliant. CASA wrote to the ALAEA and advised us that the AMO would be asked to do so.

- Dispute assurances to us, CASA did not contact the AMO to ensure compliance. Instead, they wrote about the 'confusing' instructions and potential future changes.
- The AMO advised CASA they would continue to allow B1 LAMEs to work outside their scope in B2 systems as CASA had told them they were changing the legislation to suit this.
- CASA closed the matter.

As the current legislation in Australia stands, B1 LAMEs do not have privileges covering inspections in ATA chapters identified in the Part 66 MOS as Avionic unless it is included in a daily or ETOPS pre-flight. It is illegal for you to certify for work of that nature and unlawful for your employer to direct you to do so.

In this instance the AMO was Qantas. The advice applies equally to all AMOs. Like Qantas, many AMOs are seriously understaffed. Investment in training is minimal and new LAMEs are not being employed. AMOs can only complete their work by cutting corners and ignoring legal requirements. If something goes wrong, it will be the LAME who is found to have exceeded their licence privileges. For the benefit of our industry, and profession, we need to uphold the standards. If we do not, AMOs will continue to undertrain and under employ.

CASA has turned a blind eye to these things. Recently the CASA CEO was replaced along with other Senior CASA officials we hold responsible for the decline in standards. We are hopeful that these changes will allow for a better working relationship with stakeholders such as the ALAEA. This in turn should lead to better aviation safety outcomes. Please advise us if you have been directed to work outside your category.

Regards



Stephen Re

Technical Manager