❖ N O T I C E ❖

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TO: ALL MEMBERS

RE: CASA PART 66 CONSULTATION

In December CASA released two consultation Discussion Papers (DPs) relating to Part 66 Licencing. They were:

- options for modular AME licensing, and
- options for aircraft maintenance type ratings.

The closing date for comments for both discussion papers is 12 February 2023.

Both discussion papers contain significant proposals for changes to the way a licence and ratings can be obtained in the future, and what aircraft will require type training.

On the surface the proposals would mainly benefit the General Aviation sector and would most likely be welcomed.

Modular licencing

The premise of the options put forward in the DP is a positive move back towards a Car31 style Group licence.

Currently, to obtain a first licence a B1 applicant needs to complete full theory and practical training for Airframe, Powerplant and Electrical aspects. A B2 applicant needs to complete Electrical, Instrument and Radio. Without completing these, a Part 147 training school is unable to report a licence outcome to CASA.

The DP puts forward an option to allow progressive licencing – in the same manner as CAR 31 enabled. i.e., A/F, Electrical or Powerplant, then add systems or an Instrument or Radio sub-category.

This is a move the industry has been calling for since the introduction of Part 66, and was identified by CASA as a priority in 2018.

There are some differences in the DP to CAR 31. For example, as the CASA Basic Exams no longer exist, the theory component will utilize the Part 66 Module exams. Practical will be able to be undertaken through a formal Part 147 training process or by completion of the CASA On Job Training book.

The options propose initially utilizing Exclusions on a licence to enable rapid commencement if the proposal goes ahead. Although not ideal, we believe the good outweighs the bad, to ensure a progressive solution is put in place as soon as possible. The final details will be worked on after industry provides feedback, however we have seen some models put forward that would significantly simplify the system.

One of the most important things to be established, and CASA will be making their decisions based on the consultation feedback, is what would be the minimum licence? i.e. A/F with no electrical privileges, or Powerplant with no propeller?

What will be the foundation stone to build a licence on? CASA needs feedback on the minimum licence scope required by industry. Our feeling is that the scope of the original 5 Categories under CAR 31 is a good starting point. For example (as was the case for a CAR31 Grp 1 A/F), should an Airframe rating on a non-type rated aircraft include minimum single generator electrical and general instrument privileges, or should they be an add on? Should a Piston Engine rating include propellers, or should they be an add on?

The Discussion Paper and online survey can be found on the CASA website by following this link Modular Licence Discussion Paper and Survey

Although directly relevant to most of GA and initial licence applicants, these changes would assist existing LAMEs expand their scope through new B subcategories.

Aircraft maintenance type ratings

The genesis of this DP was the type rating of a number of CAR 31 Group 19 aircraft (Helicopters with Hydraulically Powered Flight Controls) following the introduction of CASR Part 66 in 2011. Following the EASA model, CASA applied Type ratings to all Twin Engine helicopters regardless of the complexity of the aircraft (as CASA had determined during the Type Certification process). This raised a number of ongoing issues for existing LAMEs and prospective LAMEs it included being able to source and access the required Type training in order to have exclusions removed or a whole Type added. The same issue applied to Avionic LAMEs as a large number of non-type rated twin helicopters that fell under the Grp 2 Electrical (and Lower Grp rated Instrument and Radio) now require Type training. In many cases no approved Type training is available. For those helicopters that do have approved courses the cost of training is very high, to the point of being prohibitive.

There are also a number of fixed wing aircraft this applies to because they are heavier than 5700kgs. In fact, CASA addressed several of these aircraft (The RUAG228 ,DHC-4 and Air Tractor) in the Part 66 MOS Appendix IX Table 3 by only requiring a Category B1 licence, the Powerplant Type rating, or Category B2 to certify the respective maintenance. So essentially, there is already a solution in place for

fixed wing aircraft if CASA chooses to reevaluate the need for additional Type training for aircraft that didn't require it under CAR 31 (e.g Metro, Beech 300). The solution for helicopters shouldn't be anymore complicated.

The DP contains a number of "Policy Options". It is worthwhile noting that many of the options listed as being considered are in fact already in place e.g facilitating separate theory and practical training. One option, not currently available considers "grouping" aircraft, engines or avionic systems so that Type training on one aircraft or engine would cover all aircraft or engines in the group. Or training could be developed to cover multiple aircraft in one course.

Policy option 4 considers the recognition of training not approved by CASA for issuing Type ratings e.g., a manufacturer's course, or one approved by another regulator. Whilst this would significantly increase the availability of Type courses, we would recommend proceeding with caution. Without the oversight of CASA, and the direct communication and reporting responsibilities an approved training organisation has, the possibilities of substandard and fraudulent training products are greatly increased. A recent incident in Europe where fraudulent exam outcomes were being reported to a regulator for licence outcomes highlights this issue because the organisation held an EASA approval there was an ability for the local regulator to investigate and track the students and then suspend the results and take regulatory action. If no approval is held there would be little CASA could do. Also, as the training organisation wouldn't be reporting the course results directly to CASA, there would be a reliance on the validity of the certificates provided by the students, and no obligation on the training organisation to verify them with CASA. We suggest there are too many quality risks for this option. ICAO provides the option for regulators to enter an arrangement with each other to utilize each others approval and oversight systems. This seems a safer option to explore.

The Discussion Paper and online survey can be found on the CASA website by following this link Part 66 aircraft type ratings Discussion Paper and Survey

As mentioned, these Discussion Papers are addressing significant issues with the current licencing system, and we encourage members to take 10 minutes to engage with the consultation process to ensure high quality feedback is provided to CASA.

Steve Re
ALAEA Trustee