Proposed amendment to Part 66 Manual of Standards aircraft engineer licensing training - CD 1908SS

# Overview

We are proposing to amend the Part 66 Manual of Standards (MOS) to introduce a new ‘self-study’ training and examination pathway that leads to the grant of a Part 66 aircraft engineer licence.

The proposed new pathway is an alternative to the current requirement to undertake licence category training via a Part 147 Maintenance Training Organisation. It will be similar to the CASA Basics examinations/Schedule of Experience scheme that existed under the previous CAR 31 licensing system.

The Part 66 licensing system introduced in June 2011, transitioned aircraft maintenance licensing requirements from the Civil Aviation Regulations 1988 (CAR), to the Civil Aviation Safety Regulations 1998 (CASR). It adopted A, B1, B2 and C licence categories and aircraft type ratings in line with the European Aviation Safety Agency (EASA) system.

Since Part 66 came into effect, CASA has conducted a comprehensive [post-implementation review](https://consultation.casa.gov.au/regulatory-program/pir1703ms/) (PIR) of all Part 66 legislation and has received valuable feedback from key stakeholders, including Part 66 licence holders and training organisations, on the implications and effects of the aircraft maintenance licensing rules. The feedback has highlighted the opportunity to simplify and clarify some aspects of the legislation, address anomalies, gaps and unintended consequences.

The ASAP appointed a [Technical Working Group](https://www.casa.gov.au/part-66-twg-maintenance-engineer-licensing-reform) to review and address the specific issues identified in feedback received to the Part 66 PIR.

One of the primary issues identified by the PIR and discussed by the TWG was concern over industry's limited access to licence category training, examination and assessment for a Part 66 licence.

To address this issue and to more closely align Part 66 to EASA Part 66, we propose to introduce a new training pathway to obtain a Part 66 maintenance engineer licence. The new pathway would provide industry a self-study option, as an alternative to the existing Part 147 MTO requirements, under which a person may be granted a licence by:

* passing theory exams administered by CASA based on the 17 Part 66 basic knowledge modules contained in the MOS (the syllabus could be self-studied from CASA recognised EASA Part 66 textbooks)
* submitting to CASA a log demonstrating they have achieved the required practical maintenance experience on operating aircraft specific to the category of licence being applied for.

This proposal also includes the following:

* Seven miscellaneous amendments (items 46 to 52) unrelated to this proposal, that add new aircraft type ratings to the list of type ratings in Appendix IX of the Part 66 MOS. For administrative purposes, they are being consulted as part of the one instrument.
* A number of additional amendments to the Part 66 MOS to simplify current language to more closely align Part 66 to EASA Part 66, and to provide clarity to other provisions within the MOS.

# Why we are consulting

We are consulting on the proposed self-study training and examination option, to ensure the proposed amendments are clearly articulated and will work in practice as they are intended. Your feedback will help inform our policy decision-making process and any future regulatory change.

Further details regarding the proposed set of amendments to the Part 66 MOS can be found in the Summary of Proposed Change on CD 1908SS under the ‘Related’ section of this consultation. Comments on the CD 1908SS should be submitted through the online response form.

Documents for review

1. Summary of proposed change on CD 1908SS
2. Consultation draft — *Part 66 Manual of Standards Amendment Instrument 2019 (No. 1)*
3. Compilation draft — Part 66 MOS, incorporating the proposed amendments into the relevant sections of the MOS

The questionnaire has been designed to give you the option of either providing feedback on the proposal in its entirety or to provide feedback on the individual amendments throughout the Part 66 MOS.

**General comments and file upload option**

There is a general comments box at the end of the questionnaire, in which you can insert any additional comments relating to the regulatory amendment, which you may not have already addressed.

*Note: We are no longer able to offer the option to upload files due to the potential risk of malware.*

**Using an iPad**

If you are using an iPad to complete the survey you will be asked to 'download the relevant PDF'. Depending on the software you have on your iPad you may need to download the free viewer to review the single document PDF files. Where a file is a 'multi-file or portfolio PDF you will need to source the Adobe free view - available from iTunes.

### What happens next

Once the consultation has closed, we will register and review each submission received through the online response form. We will make all submissions publicly available on the Consultation Hub, unless you request your submission remain confidential. We will also publish a Summary of Consultation which summarises the feedback received.

Give Us Your Views

[Online Survey](https://consultation.casa.gov.au/regulatory-program/pp1816us/consultation/)

**Related**

List of documents to attached to the consultation

* Summary of proposed change on CD 1908SS
* Consultation draft — *Part 66 Manual of Standards Amendment Instrument 2019 (No. 1)*
* Compilation draft — Part 66 MOS, incorporating the proposed amendments into the relevant sections of the MOS
* Word doc – Consultation - Proposed amendments to Part 66 Manual of Standards aircraft engineer licensing training - CD 1908SS

## Audiences

CASA Staff Engineers Part 147 Maintenance training organisations

## Interests

Airworthiness/maintenance (CAR 30 and Part 145 maintenance orgs) Licensing

**Page: About this consultation**

This consultation asks for your feedback on the *proposed amendments to Part 66 Manual of Standards – aircraft engineer licensing training - (CD 1908SS).*

We will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **demographic information** to help us understand your interest in the regulations
* **your consent** to publish your submission
* **your responses** to the proposed changes in the regulations
* **any comments** you may want to provide

Information about how we consult and how to make a confidential submission is available on the **CASA website** [*<https://www.casa.gov.au/rules-and-regulations/landing-*](http://www.casa.gov.au/rules-and-regulations/landing-) *page/consultation-process>* .

To be notified of any future consultations, you can subscribe to our **consultation and rulemaking mailing list** *<https://mailinglist.casa.gov.au/?p=subscribe&id=3>*.

# **Page 1: Personal information**

## First name

(Required)

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## Last name

(Required)

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## Email address

If you enter your email address you will automatically receive an acknowledgement email when you submit your response.

## Email

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## Do your views officially represent those of an organisation?

(Required)

*Please select only one item*

* Yes, I am authorised to submit feedback on behalf of an organisation
* No, these are my personal views.

## If yes, please specify the name of your organisation.

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Which of the following best describes the group you represent?

*Please select only one item*

* Licensed aircraft maintenance engineer (LAME)
* Part 147 maintenance training organisation (MTO)
* CAR 30 maintenance organization (CAR 30)
* Part 145 approved maintenance organisation (AMO)
* Other

Please specify “Other” if selected.

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Post code

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# **Page 2: Consent to publish submission**

In order to provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

* **your last name**, if the submission is made by you as an individual
* **the name of the organisation** on whose behalf the submission has been made
* **your responses and comments**

We **will not** include any other personal or demographic information in a published response.

Information about how we consult and how to make a confidential submission is available on the **CASA website** [*<https://www.casa.gov.au/rules-and-regulations/landing-*](http://www.casa.gov.au/rules-and-regulations/landing-) *page/consultation-process>* .

## Do you give permission for your response to be published?

(Required)

*Please select only one item*

* Yes - I give permission for my response/submission to be published.
* No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.
* I am a CASA officer.

**Page 3:** Feedback on proposed amendments to Part 66 Manual of Standards aircraft engineer licensing training - CD 1908SS

Please provide your comments on the proposed amendments to Part 66 MOS in the comments box below.

# You will find details regarding each proposed amendment in the fact banks below.

To ensure we can clearly identify the amendment to which each one of your comments applies, please identify the item you are referring to when making your comment/s.

For example:

Item [45] Appendix II, clause 2 – I support this amendment

Fact Bank: Details of each proposed amendment

**Fact Bank:** Part 66 MOS - Compilation draft – proposed Part 66 self-study training pathway

Comments

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# **Page 4: General comments**

## Do you have any additional comments about the proposed policy?

*(Please note, this should not include points you have already raised in this consultation)*

Comments

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**Page5: Your priorities**

When you reflect on the feedback you have provided to this consultation, what are the three issues you consider the most important?

Priority 1

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Priority 2

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Priority 3

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