



Australian Government
Civil Aviation Safety Authority

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SUMMARY OF PROPOSED CHANGE

Proposed amendments to Part 66 MOS – Modular licensing, new aircraft type ratings and other machinery changes

Project number: MS 16/05

File ref: D24/225027

July 2024

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Overview

Part 66 of the *Civil Aviation Safety Regulations 1998 (CASR)* sets out the requirements for the application for, the granting of, and the appropriate use of aircraft maintenance engineer licences and ratings.

The detailed standards for the issue of aircraft engineer licences, ratings, other requirements (including training and examination requirements) and privileges associated with the licence, are included in the Part 66 Manual of Standards (MOS).

CASA has prepared this Summary of Proposed Change (SPC) document to provide details of the proposed changes it is intending to make to the Part 66 MOS:

- Modular licensing amendments
 - relocate the table that identifies the vocational education and training (VET) units of competency (UOCs) required for a category or subcategory of modular licence (currently located in the Part 66 AMC/GM document), into the 66 MOS.
- Machinery amendments
 - make other minor ‘machinery’ changes to some of the modular licence amendments originally published in the 66 MOS in December 2023, to support relocation of the table mentioned above and to correct some unintended inaccuracies.
 - CAR 31 provisions provided in the 66 MOS.
 - » repeal the provisions in the MOS that enabled use of the CAR 31 (CASA Basics and schedule of experience (SOE)) training scheme, to obtain various equivalent Part 66 licence outcomes.
- Appendix II amendments – basic knowledge examination standard
 - amend the stand-down periods (prescribed in the examination standard) which locks out a licence candidate for defined periods of time, from retaking a failed basic knowledge module exam.
- Appendix IX amendments – aircraft type ratings
 - add some new aircraft type ratings to tables located in Appendix IX of the 66 MOS.

The Part 66 MOS includes the aircraft types and type rating endorsements that CASA has designated as requiring specific type training. The proposed amendments to Appendix IX of the 66 MOS are to update the type rated aircraft types and type rating endorsements to support planned operations and maintenance of the associated aircraft types.

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Acknowledgement of Country

The Civil Aviation Safety Authority (CASA) respectfully acknowledges the Traditional Custodians of the lands on which our offices are located and their continuing connection to land, water and community, and pays respect to Elders past, present and emerging.

Artwork: James Baban.

1 Reference material

1.1 Acronyms

The acronyms and abbreviations used in this SPC are listed in the table below.

Table 1. Acronyms

Acronym	Description
AEL	aircraft engineer licence
AMC/GM	Acceptable Means of Compliance / and Guidance Material for Part 66
CAAS	Civil Aviation Authority Singapore
CAR	<i>Civil Aviation Regulations 1988</i>
CASA	Civil Aviation Safety Authority
CASR	<i>Civil Aviation Safety Regulations 1998</i>
EASA	European Union Aviation Safety Agency
FAA	Federal Aviation Administration (USA)
LIRA	Legal, International and Regulatory Affairs (CASA)
MOS	Manual of Standards
MTO	Maintenance Training Organisation
NAA	National Aviation Authority
NZCAA	New Zealand Civil Aviation Authority
SOE	schedule of experience
SPC	Summary of Proposed Changes
TC	Type Certificate Holder
TWG	technical working group
UKCAA	United Kingdom Civil Aviation Authority
UOC	unit of competency
VET	vocational education and training

1.2 References

Legislation

Legislation is available on the Federal Register of Legislation website <https://www.legislation.gov.au/>

Table 2. Legislation references

Document	Title
Part 66 of CASR	Continuing airworthiness—aircraft engineer licences and ratings
Part 66 MOS	Part 66 Manual of Standards
Part 66 AMC/GM	Part 66 Acceptable Means of Compliance / and Guidance Material
Subpart 202.CG of CASR	Transitional provisions for Part 66 (Continuing airworthiness—aircraft engineer licences and ratings)

2 Introduction

2.1 Issues and purpose

This SPC provides details of amendments CASA is proposing to make via an amendment instrument to the Part 66 Manual of Standards (MOS) that will:

- relocate the table that identifies the vocational education and training (VET) units of competency (UOCs) required for a category or subcategory of modular licence (currently located in the Part 66 Acceptable Means of Compliance / and Guidance Material (AMC/GM) document), into a new Appendix (**Appendix X**) in the Part 66 MOS.
- make other minor adjustments to some of the modular licence amendments originally published in the Part 66 MOS in December 2023, to support relocation of the modular licensing UOC table (from the AMC/GM into the 66 MOS), and to correct some unintended inaccuracies.
- removal of various Part 66 MOS provisions that enabled use of the regulation 31 of the *Civil Aviation Regulations 1988* (CAR) (i.e., **CAR 31** *CASA Basics exams and schedule of experience (SOE)* training scheme) to obtain various equivalent Part 66 licence outcomes.
 - Use of these provisions (by a Part 66 licence applicant) ceased on 30 June 2021 and were repealed by subregulation 202.345 (3) of CASR on 01 July 2022.
- amend the stand-down periods prescribed in the Part 66 basic knowledge examination standard, which locks out a licence candidate for a defined period, from retaking a failed basic knowledge module exam.
- update the type rated aircraft types and type rating endorsement tables provided in Appendix IX of the Part 66 MOS.

2.1.1 The Part 66 Manual of Standards Amendment Instrument 2024 (No. 1)

The amendment instrument will:

- omit the current definition of *logbook*.
- insert a definition of *basic practical experience logbook*.
- insert a definition of *modular licence basic practical experience logbook*.
- omit the definition of *RPL*.
- amend 66.A.20 (a) 5A. (i) & (iii), including removal of the Note that sits directly under this 66 MOS provision, to support removal of the 'now expired' provisions in the 66 MOS that enabled use of the CAR 31 training scheme to obtain various equivalent Part 66 licence outcomes.
- amend 66.A.25 (eb) to clarify an applicant's requirement to hold each unit of competency marked with an "X" in Appendix IV of the 66 MOS or stated to be its equivalent for the relevant category or subcategory of licence.
- amend 66.A.25 (ec) including the *Note*, to support relocation of the modular licensing UOC table (from the AMC/GM into the 66 MOS), and to correct some unintended inaccuracies.
- after paragraph (ec), add a definition of '*stated to be its equivalent*' to provide clarity of the use of this term in the MOS.
- amend 66.A.25 (fa) to support relocation of the modular licensing UOC table (from the AMC/GM into the 66 MOS).
- omit 66.A.25 (i) including the heading, and (j). These provisions enabled use of the **CAR 31** (*CASA Basics exams and schedule of experience (SOE)*) training scheme to obtain an equivalent Part 66

licence. Use of these provisions ceased on 30 June 2021 and were repealed by subregulation 202.345 (3) of CASR on 01 July 2022.

- after 66.A.30 (a) 4. (ii), add clarity for an applicant's use of the Modular Licence Basic Practical Experience Logbook.
- amend 66.A.30 (a) 4, *Note 2*, to provide an updated reference to the location of the Part 66 Modular licence logbook and User Guide on CASA's website.
- insert new paragraph (aa) to clarify that an applicant who is applying for a Category A licence, a subcategory B1.1, B1.2, B1.3 or B1.4 licence (other than a modular licence), or a Category B2 licence (other than a modular licence), who has elected to use the self-study pathway, must record evidence of their practical experience in the Basic Practical Experience Logbook.
- amend the explanatory text below Table 3A, of 66.A.30 for the definition of *task list*, to provide a corrected reference to the Modular licence logbook.
- omit 66.A.30 (f) including the heading, and (g). These provisions enabled use of the **CAR 31 (CASA Basics exams and schedule of experience (SOE)) training scheme** to obtain an equivalent Part 66 licence. Use of these provisions ceased on 30 June 2021 and were repealed by subregulation 202.345 (3) of CASR on 01 July 2022.
- omit 66.A.45 (j) including the heading, and (k). These provisions enabled use of the **CAR 31 (CASA Basics exams and schedule of experience (SOE)) training scheme** to obtain an equivalent Part 66 licence. Use of these provisions ceased on 30 June 2021 and were repealed by subregulation 202.345 (3) of CASR on 01 July 2022.
- substitute sections 66.A.56 to 66.A.58 with an amended section 66.A.56 to support the repeal of the Part 66 MOS provisions that enabled use of the **CAR 31 (CASA Basics exams and schedule of experience (SOE)) training scheme** to obtain various equivalent Part 66 licence outcomes.
- substitute the heading for section 66.A.70, to accurately align to the subject of this provision (i.e., information on removal of exclusions).
- amend the text of paragraph 66.A.70 (a), to clarify the subject of this provision (i.e., information regarding exclusions, as opposed to limitations).
- Appendix II Basic knowledge examination standard – amend the timeframe (i.e., from 90 days down to 30 days), prescribed under clause 1.11, which locks out a licence candidate for a defined period, from retaking a failed basic knowledge module exam.
- Appendix II Basic knowledge examination standard – amend clause 1.11 to remove the 30-day stand-down period and related information, which locks out a licence candidate for a defined period, from retaking a failed basic knowledge module exam if they have undertaken a course of retraining conducted by a Maintenance Training Organisation (MTO), tailored to the failed subjects of an exam module.
- Appendix II Basic knowledge examination standard – amend the timeframe (i.e., from 1 year down to 6 months), prescribed under clause 1.13, which locks out a licence candidate for a defined period, from retaking a failed basic knowledge module exam after three consecutive failed attempts.
- add a new type certificate (TC) holder – HONDA AIRCRAFT COMPANY LLC, and a new aircraft type rating, to the list of TC holders and their aircraft type ratings currently listed in Appendix IX, Table 1.
- add a new type certificate (TC) holder – TEXTRON AVIATION INC., and a new aircraft type rating, to the list of TC holders and their aircraft type ratings currently listed in Appendix IX, Table 1.
- add a new type certificate (TC) holder – GULFSTREAM AEROSPACE LP (GALP) c/o Israel Aircraft Industries, and a new aircraft type rating, to the list of TC holders and their aircraft type ratings currently listed in Appendix IX, Table 2, Part 1.
- add a new type certificate (TC) holder – NEXTANT AEROSPACE LLC (STC), new aircraft type ratings and a new type rating endorsement, to the list of TC holders and their aircraft type ratings currently listed in Appendix IX, Table 1.

- update the aircraft type rating information currently listed for type certificate (TC) holder – AIRBUS HELICOPTERS, in Appendix IX, Table 5.
- update the aircraft type rating information currently listed for type certificate (TC) holder – AIRBUS HELICOPTERS DEUTCHLAND GmbH, in Appendix IX, Table 5.
- update the type rating endorsement information (for the EC135 P3H), currently listed for type certificate (TC) holder – AIRBUS HELICOPTERS DEUTCHLAND GmbH, in Appendix IX, Table 5.
- insert new Appendix X, which adds the table (previously found in the Part 66 AMC/GM document) that lists the units of competency required for a category or subcategory of modular licence.

2.2 Background

2.2.1 Relocation of the units of competency table for modular licence training (out of AMC/GM into the 66 MOS)

CASA proposes to add to the Part 66 MOS a table that identifies the UOCs required for each category or subcategory of modular licence. Furthermore, this table sets out the training requirements an MTO must comply with to deliver modular licensing training using the MTO training pathway.

Fundamentally, this table identifies (from the existing UOCs listed in Appendix IV of the Part 66 MOS, required for each category or subcategory of a 'full' Part 66 licence), each UOC an applicant must hold for a relevant category or subcategory of a modular licence.

As recommended by the Legal, International and Regulatory Affairs (LIRA) Branch within CASA, and as stated in the modular licence amendments made in the Part 66 MOS in late December 2023:

- Due to time constraints finalising the content of the UOC mapping table stated above, the table was initially published in the Acceptable Means of Compliance (AMC) and Guidance Material (GM) to CASR Part 66 in March 2024. This approach was enabled to permit an MTO to apply to CASA for approval to add modular licence category training to the scope of their MTO approval.
- After initial publication of the table in the Part 66 AMC/GM, CASA will permanently relocate the table into a dedicated Appendix in the Part 66 MOS. This approach provides a level of consistency for how UOC information is presented in the current table in Appendix IV of the MOS, which identifies the UOCs required for each category or subcategory of a 'full' Part 66 licence.

As a consequence, other minor 'machinery' changes are required to be made to some of the modular licence amendments originally published in the Part 66 MOS in December 2023, to support the above approach and to correct some unintended inaccuracies.

2.2.1.1 Consultation

CASA's approach to relocate the table of UOCs out of the Part 66 AMC/GM document and into the Part 66 MOS at the next available 66 MOS amendment opportunity, was communicated to the Part 66 Technical Working Group (TWG) in Dec 2023, just prior to publication of the modular licence amendments in the Part 66 MOS.

2.2.2 Repeal of MOS provisions that enabled use of CAR 31

The Part 66 licensing scheme commenced on 27 June 2011. As part of this introduced change to licensing and in lieu of training under the Part 147 MTO pathway, CASA permitted a transitional period for licence candidates to use the previous licence training scheme, to complete commenced training under the CAR 31 CASA Basics exams and schedule of experience (SOE) to obtain equivalent Part 66 licence outcomes. In addition, extension of the use of CAR 31 also allowed individuals to use CASA Basics exams and SOE to remove an exclusion from a category or subcategory of licence or from a rating on a licence they already held.

To enable the continued use of CAR 31 after the cessation of the initial CAR 31 transition period (June 2011 to Jun 2015), provisions were drafted into the following relevant sections of the Part 66 MOS:

- 66.A.25 – Basic knowledge and competency requirements
 - specifically, paragraphs 66.A.25 (i) and (j).
- 66.A.30 – Basic practical experience requirements
 - specifically, paragraphs 66.A.30 (f) and (g).
- 66.A.45 – Type/task training and ratings
 - specifically, paragraphs 66.A.45 (j) and (k).
- 66.A.56 – Use of CAR 31 for removal of exclusion from a Part 66 licence on or after 27 June 2015.
- 66.A.57 – Use of CAR 31 for removal of exclusion from a Part 66 rating on or after 27 June 2015.
- 66.A.58 – Exemptions to facilitate the operation of certain provisions.

Appreciating the transition period for use of CAR 31 to qualify for a Part 66 licence formally concluded on 30 June 2021, these provisions are no longer required in the Part 66 MOS.

Note: Each paragraph listed above allowed for use of the CAR 31 licence training scheme, which ceased on 30 June 2021 and was repealed by regulation on 1 July 2022 (ref: CASR sr.202.345 (1) and (3) – Compilation No. 91, dated: 22 March 2021).

In addition, subparagraph 66.A.20 (a) 5A of the Part 66 MOS was also drafted to identify additional Category B1 licence privileges. Subparagraph 66.A.20 (a) 5A enabled a person who on or before 30 June 2021, who used CAR 31 to satisfy the basic knowledge and competency requirements, basic practical experience requirements and type/task training and ratings requirements of the 66 MOS, to be issued a Category B1 licence to perform maintenance certifications and issues certificates of release to service for specific maintenance mentioned under sub-subparagraphs (iii), (iv), (v) and (vi).

While this subparagraph continues to specify additional privileges that may be exercised by a person who holds a Category B1 licence beyond 30 June 2021, this provision needs to be retained in the MOS. However, appreciating the transition period for use of CAR 31 to qualify for a Part 66 licence formally concluded on 30 June 2021, this Part 66 MOS provision will be amended to be expressed in the 'past tense'.

2.2.3 Appendix II exam stand-down period amendments

Appendix II of the Part 66 MOS specifies the Part 66 basic knowledge examination standard for aircraft engineer licensing training. The standard, among other things, sets out under clause 1.11 and clause 1.13 specific timeframes (stand-down periods) which a licence candidate must comply with, before a failed module examination may be retaken.

Due to CASA's introduction of Part 66 (in June 2011) being based on the EASA Part 66 licensing and training scheme, CASA's examination stand-down timeframes prescribed in the 66 MOS, accurately mirror that of EASA Member States and other like-minded 'EASA Part 66 based' jurisdictions (such as UKCAA).

Recent industry feedback to CASA expressed concern that the current prescribed stand-down periods are unnecessarily prescriptive and strict for trainees studying towards a Part 66 aircraft engineer licence (AEL). In response to industry's concerns, CASA has reviewed the policy and current timeframes prescribed in legislation, to develop a more flexible approach that would assist a candidate's progression of their training towards attaining a licence.

2.2.3.1 Research

In review of the existing policy, CASA carried out a comparison exercise against CASA's existing policy which compared the examination 'stand-down' periods prescribed by other National Aviation Authorities

(NAAs) – (i.e., EASA, UKCAA, NZCAA, CAAS [Singapore], FAA & Transport Canada). While all NAAs did prescribe stand-down periods, all differed from one-to-another, except for EASA and UKCAA, which mirrored CASA's existing policy – due to all being EASA Part 66 based.

2.2.3.2 Clause 1.11 stand-down periods

Considering the current 90-day stand-down period that excludes a candidate from re-sitting an exam after the first failed attempt (clause 1.11), the stand-down periods prescribed by other NAAs and recent industry comments, there is appetite for CASA to reduce this period. However, to enable a candidate time to adequately review the failed subjects and prepare themselves for their next re-sit of a failed exam, CASA proposes to reduce this period to no less than 30 days. This suggested timeframe is somewhat consistent with other NAA timeframes.

Reducing the 90-day period to 30 days effectively aligns this timeframe to the current 'discounted' 30-day period (also in clause 1.11) a candidate (who undertakes a course of retraining conducted by an MTO, tailored to the failed subjects of a module) is excluded from re-sitting a failed exam. The result of reducing the stand-down period from 90 days to 30 days, removes the need to separately prescribe any timeframe for candidates undertaking a course of retraining in an MTO, with the requirement to undertake a course of retraining now considered unnecessary. Accordingly, CASA proposes to remove the MTO 30-day stand-down period from clause 1.11. This course of action would be consistent with the other NAAs examined in the review, most of which do not prescribe any discounted stand-down period, or any course of retraining requirement for candidates who fail an examination.

2.2.3.3 Clause 1.13 stand-down period

Giving consideration to the current 1-year stand-down period that excludes a candidate from re-sitting an exam after 3 failed attempts in one calendar year (clause 1.13), the stand-down periods prescribed by other NAAs and recent industry comments, there is appetite for CASA to reduce this period. CASA proposes to reduce this period to 6 months while giving consideration of the following:

- A candidate is required to pay for each exam sitting, regardless of whether the exam is successfully passed or failed. Therefore, it is in the candidate's best interests (including financially), to ensure they adequately prepare and not commit to re-sit a failed exam, until they are confident they have attained the knowledge they will be examined on, thus increasing their chance of successfully passing the exam at the next attempt.
- A proposed 6-month stand-down period is considered by CASA to be an acceptable timeframe for a candidate to prepare themselves to re-sit an exam they have failed 3 times in the last calendar year. Any period less than 6 months would likely not give a candidate adequate time to revise and prepare for their next exam attempt. It would increase the likelihood of a candidate failing the exam at their 4th attempt and jeopardise the sustainability of the exam bank of questions.

2.2.3.4 Consultation

In support of the review of this proposal, CASA has consulted with CASA's contracted Part 66 module exam provider (ASPEQ) and MTOs to gauge whether there could be any unforeseen circumstances, flow-on effects, or fallout, if the existing stand-down timeframes were adjusted (relaxed).

2.2.4 Appendix IX type rating amendments

Appendix IX of the Part 66 MOS specifies the aircraft types and type rating endorsements for various categories of aircraft engineer licences that CASA has designated as requiring specific type training. This amendment instrument updates the list of aircraft type ratings and rating endorsements in Appendix IX by the addition and variation of items. The amendments were initiated at the request of aircraft operators and maintainers to support planned operations of these aircraft types.

2.2.4.1 Consultation

The amendments of the *Part 66 Manual of Standards Amendment Instrument 2024 (No. 1)* that propose to add new aircraft type certificate (TC) holders and new aircraft type ratings to the lists of type rated aircraft under Appendix IX of the Part 66 MOS are being made at the request of individual aircraft operators and maintainers who will shortly commence operations and maintenance of those aircraft being added to the Part 66 MOS.

3 Impact on industry

The amendments associated with modular licensing and CAR 31 transition provisions are administrative changes that would have no substantive effect on industry.

The proposed changes to the failed exam stand-down periods would have a minor beneficial impact on industry by potentially reducing the time to achieve a licensing outcome.

The type rating amendments will only affect those individual operators and maintainers who will operate and maintain them. It should be noted, for aircraft that CASA has designated in the Part 66 MOS as requiring a type rating, specific aircraft type training is required by aircraft engineers prior to them being able to certify for maintenance performed on these aircraft.

These amendments are considered to have a positive and appropriate safety effect on industry and those affected parties in that they require individuals who will maintain and certify maintenance performed on these aircraft to undertake aircraft specific type training, which will maintain an appropriate level of safety.

It is acknowledged that the additional training involves additional costs for licence holders to be able to exercise the privileges of their licence on the affected aircraft types. These arrangements and the associated costs are an integral element of the Part 66 licensing system and, in that context, are considered appropriate to maintain an appropriate level of safety for the applicable aircraft types.

3.1 Safety risk analysis

These amendments do not substantially alter existing regulatory arrangements, so a detailed safety risk assessment is not required.

The amendments associated with modular licensing and CAR 31 transition provisions are administrative changes that would have no substantive safety effect.

The proposed changes to the failed exam stand-down periods are not expected to have any effect on safety as they only affect timeframes, not the knowledge requirements.

The amendments that add new aircraft type certificate (TC) holders, and new aircraft type ratings to the lists of type rated aircraft under Appendix IX of the Part 66 MOS, are expected to only effect those individual operators and maintainers who will operate and maintain these new aircraft.

The affected aircraft types are certified in the transport category and have a level of size and complexity that warrants type rating and the associated additional training.

These amendments are considered to have a positive safety effect in that they require licence holders who will maintain and certify maintenance performed on these aircraft to undertake aircraft specific type training, which in turn will enhance aviation safety.

3.2 Regulation impact analysis

An impact analysis (IA) is not expected to be required as these amendments would have no substantive impact and the type rating amendments are covered by a standing agreement between CASA and OIA under which an IA is not required for the addition of aircraft types to the Part 66 MOS (OBPR id: 20488).

4 Submitting your feedback

We would like to hear your views on the amendments we have presented. Please review the proposed amendments to Part 66 MOS and provide your feedback to these proposed amendments.

Your feedback will make a valuable contribution to CASA's policy decision-making process and help to fully inform CASA of the perceived impacts (positive and negative) on the aviation community regarding the proposal.

CASA will consider all comments received as part of this consultation process and incorporate changes as appropriate. Comments on this consultation should be submitted through the online response (CASA Consultation Hub) form by close of business 28 August 2024.