MAINTENANCE ENGINEER LICENSING (PART 66)
ASAP TECHNICAL WORKING GROUP (TWG)
TASKING INSTRUCTIONS

The Maintenance Engineer Licensing (Part 66) Technical Working Group is established and operates in accordance with the Terms of Reference of the Aviation Safety Advisory Panel (ASAP) dated September 2017 (or as amended).

PURPOSE

The role of the TWG will be to provide relevant technical expertise and industry sector insight for the analysis and review of Civil Aviation Safety Regulations (CASR) Part 66 and Manual of Standards (MOS) in accordance with the agreed policy principles.

The TWG will:

- Provide industry sector insight and understanding of current needs and challenges

- Provide current, relevant technical expertise for the development, analysis and review of legislative and non-legislative solutions to the identified issues

- Assist with the development of draft regulations, guidance materials and other supporting materials

- Provide endorsement and or conditional endorsement of draft regulations, guidance materials and other supporting materials for consideration by the ASAP and CASA.

- Consider whether there are any related opportunities for improvement to CASR Part 147 (Maintenance Training Organisations)

POLICY OUTCOMES

The core policy outcome for the reform of Part 66 is alignment, to the greatest extent possible, with European Aviation Safety Agency (EASA) equivalent regulations. EASA regulations are widely recognised globally as a benchmark standard that is both practical and appropriate.

Other key objectives and policy outcomes to guide all activity on the reform of Part 66 regulations are to:

- reduce the complexity and streamline Part 66 regulations and the Manual of Standards (MOS)
- remove ambiguities and fix anomalies presently in the legislation and guidance material
- create a more progressive licensing system that includes a licence outcome appropriate for the general aviation sector of the industry
- improve the way privileges are stated on licences to provide clarity
- reduce the prescriptiveness of the Part 66 MOS and rely on the EASA knowledge modules as the licensing standard, in order to provide more flexibility for future development of training packages

- ensure legislation and training requirements maintain compliance with ICAO standards and recommendations
- work closely with the Aerospace Education and Training Industry Reference Committee (IRC) to establish a more efficient and structured training package for the complete licensing system, comprised of competency units that accurately align to the subjects contained within the EASA knowledge modules.
- seek to achieve recognition of prior learning between EASA and CASA

SPECIFIC OBJECTIVES

The project has three key components.

1. **Legislation**. Review and recommend changes to the Part 66 regulations and MOS, to achieve the policy outcomes.
2. **Licence privileges.** Review and recommend changes to clarify and improve the understanding of licence privileges to achieve the policy outcomes.
3. **Aeroskills training.** To assist, where necessary, in the development of a revised Aeroskills training package by the Aerospace Education and Training Industry Reference Committee (IRC) of the Department of Education.

REPORTING ARRANGEMENTS

The TWG will provide a status report to the regular meetings of the ASAP on progress.

Recommendations and reports of the TWG will be provided to the Chair of the ASAP, through the secretariat.

Timelines for specific outputs will be developed as part of the initial work, with an update included with the first status report.

ROLES AND RESPONSIBILITIES

CASA	TWG Members
- Organise meetings and workshops, and produce agendas, papers and supporting materials - Facilitate meetings and workshops - Record insights and findings - Communicate openly and consistently with TWG members about project status and issues - Respect the time of all TWG members by minimising work required to achieve outcomes	- Commit to supporting the project objectives and timeline - Engage and collaborate constructively at all times - Prepare for working group activities by reviewing agendas, papers and supporting materials - Provide timely and considered advice in meetings, and between meetings as required - Respond to requests for feedback on draft materials within agreed timeframes

CONSENSUS

A key aim of the TWG is that a consensus be reached, wherever possible, in the finalisation and preparation of advice for the ASAP and CASA.

The TWG will be guided by the ASAP Terms of Reference (Section 6) with respect to determining and documenting consensus.

MEMBERSHIP

Members of the TWG have been appointed by the ASAP Chair, following ASAP processes.

The Part 66 TWG consists of the following members:

Michael McGill (CASA Lead)	Keith Blaik	Mark Thompson
Jared Smith	Wayne Davey	Steven Wright
Rod Tomlins	Mary Brown	*Stephen Re
**Ted Goetz	***Alex Parpaiola	

* Participated days 1 and 2 only.

**Participated Day 1 only

*** Participated Day 3 only

The TWG CASA Lead was joined by CASA subject matter experts, Saskia Ford, Peter Ball, Mark Hinchliffe, Craig Johnson and Matt Castello throughout the meeting.

The ASAP Secretariat was represented by Matthew Bouttell.

1. PROCESS FOR ACHIEVING CONSENSUS

As required by the ASAP (& TWG) Terms of reference, there must be agreement by all participants on the method used for obtaining consensus.

To obtain consensus, the quorum consisting of ten industry representatives, undertook a vote at the end of day three to ascertain whether the consensus (or otherwise) has been met on the outcomes of this TWG workshop. This vote was conducted by the ASAP Secretariat and recorded under Outcomes A and B.

Those two TWG participants not present on day three provided their views remotely during the weeks following the TWG meeting. In addition, some of the TWG members have participated in an online discussion using the 'Dialogue' engagement tool, which is a private tool managed by the Secretariat, to put forward ideas for the final report. The Secretariat has now circulated a final draft of this report (and attachments) for endorsement by all TWG members prior to formally providing the report to the ASAP Chair.

The CASA Lead has also provided commentary of the effectiveness of the TWG and whether it's believed that the recorded outcomes are a fair representation of the TWG from a CASA perspective.

2.   SUMMARY OF OUTCOMES – TWG Meeting 4-6 April 2018

This meeting of the TWG worked towards achieving the overall TWG outcomes as described in the ASAP TWG Tasking Instructions listed under three categories: **Legislation, Licence privileges and Aeroskills training.**

The two below outcomes seek to ascertain whether a mutual understanding between CASA and the TWG has been reached in the three key areas and across the solutions for the 40 identified issues so CASA can progress in the development of draft updates to the CASR Part 66 and MOS.

A.   Was there consensus achieved among the TWG members for a way forward to a solution for the 40 identified issues currently contained within the CASR Part 66 and Part 66 Manual of Standards?

CONSENSUS   /   **GENERAL CONCENSUS**   /   DISSENT

Comments:

A positive experience for all TWG members to learn from. Discussions on the many issues over this 3-day meeting were engaging and informative and evidence of how industry and CASA can effectively work together.

The TWG reached a general consensus, recognising that the following 2 broad areas require further clarity to assist industry's understanding of Part 66:

1. Licence privilege and scope; and
2. Aeroskills training

Furthermore, EASA harmonisation needs to form part of this process.

The attached issues register details progress made in each specific dot point including guidance around possible solutions to the issues raised.

Work will continue offline to address those specific issues where further work is required.

B.   By applying solutions to the identified issues, is the TWG satisfied that CASR Part 66 and Part 66 MOS will achieve its policy intent, as outlined in the tasking instruction, and be implementable

CONSENSUS   /   **GENERAL CONCENSUS**   /   DISSENT

Comments

By making what is ultimately considered the necessary changes and amendments to the Regulation suite, to remove ambiguity, clearly define and simplify the content, the desired policy outcomes should be achieved.

The details of specific solutions and changes require further work, but progress and guidance so far is detailed in the attached issues register

1) Communication and education were identified as essential elements in achieving this goal.
2) There was general agreement there should be a 'line in the sand' for the cessation of the old regulatory suite and all future dealings with licensing be only based on complete Part 66 regulations
3) In line with the item 2) above, the removal of CASA basics exams to allow use of the complete Part 66 regulations should occur and thus ultimately stop the issuing of licenses with exclusions on them - hence EASA alignment.

C. Does the TWG have any other feedback that should be considered by the ASAP?

Comments:
The TWG recognised the dependencies for the complete ruleset associated with aircraft maintenance (66, 145, 147, CAR 30 & 42).

Concept and purpose of the TWG process, along with the diverse group has proven to be valuable identifying and providing initial resolution. Its been a successful example of engagement amongst colleagues, both industry and CASA.

CASA Lead Summary
Michael McGill
Comment: A positive experience for all TWG members to learn from. Discussions on the many issues over this 3-day meeting were engaging and informative and evidence of how industry and CASA can effectively work together. I'm confident this diverse group's efforts will produce the solutions needed to resolve these Part 66 issues. Thank you to all participants.

Part 66 Future direction

This TWG meeting has focused on addressing issues identified through the Part 66 PIR. The review of draft regulation has not yet been produced, and it's acknowledged that some issues are still outstanding.

It is proposed that the Part 66 TWG continue to communicate out of session to resolve any outstanding matters. This would be coordinated by the CASA Lead and ASAP Secretariat.

CASA would then draft the revised CASR and MOS then seek TWG review and input. Depending upon the preference from the TWG members and CASA, this may be performed either in or out of session (ie- physical meeting). At this point the TWG would provide advice to the ASAP as to whether there is consensus that the draft CASR and MOS are fit for public consultation. Post-public consultation this TWG will assess feedback and proposed outcomes from CASA before providing the ASAP with a final endorsement (or otherwise) of the draft regulation and MOS.

To ensure transparency, it is the intention of the ASAP to publish this report, along with other supporting material including participant names and group photo on the ASAP Website – which is hosted on the CASA website.

(*extract*) From ASAP and TWG Terms of Reference regarding Consensus

6.1 A key aim of the ASAP is that a consensus be reached, wherever possible, in the finalisation and preparation of advice to the CEO/DAS.

6.2 For present purposes, 'consensus' is understood to mean agreement by all parties that a specific course of action is acceptable.

6.3 Achieving consensus may require debate and deliberation between divergent segments of the aviation community and individual members of the ASAP or its Technical Working Groups.

6.4 Consensus does not mean that the 'majority rules'. Consensus can be unanimous or near unanimous. Consensual outcomes include:

6.4.1 Full consensus, where all members agree fully in context and principle and fully support the specific course of action.

6.4.2 General consensus, where there may well be disagreement, but the group has heard, recognised, acknowledged and reconciled the concerns or objections to the general acceptance of the group. Although not every member may fully agree in context and principle, all members support the overall position and agree not to object to the proposed recommendation.

6.4.3 Dissent, where differing in opinions about the specific course of action are maintained. There may be times when one, some, or all members do not agree with the recommendation or cannot reach agreement on a recommendation.

Determining and Documenting Consensus

6.5 The ASAP (and Technical Working Groups) should establish a process by which it determines if consensus has been reached. The way in which the level of consensus is to be measured should be determined before substantive matters are considered. This may be by way of voting or by polling members. Consensus is desirable, but where it is not possible, it is important that information and analysis that supports differing perspectives is presented.

6.6 Where there is full consensus, the report, recommendation or advice should expressly state that every member of the ASAP (or Technical Working Group) was in full agreement with the advice.

6.7 Where there is general consensus, the nature and reasons for any concern by members that do not fully agree with the majority recommendation should be included with the advice.

6.8 Where there is dissent, the advice should explain the issues and concerns and why an agreement was not reached. If a member does not concur with one or more of the recommendations, that person's dissenting position should be clearly reflected.

6.9 If there is an opportunity to do so, the ASAP (or Technical Working Group) should re-consider the report or advice, along with any dissenting views, to see if there might be scope for further reconciliation, on which basis some, if not all, disagreements may be resolved by compromise.

Appendix

1. TWG Agenda
2. Table - Summary of actions and feedback from TWG

Part 66 Post Implementation Review (PIR)

ASAP Technical Working Group (TWG) meeting

Wednesday, Thursday, Friday 4 th 5th & 6th April 2018

Meeting Agenda

Meeting:	Part 66 PIR Technical Working Group (TWG)
Date:	Wednesday 4th to Friday 6th April 2018
Time:	9:00am – 4:30 pm Wed & Thu, 9:00am – 3:00pm Fri
Location:	CASA Training room – level 1, 16 Furzer St Phillip, ACT
Papers:	• Part 66 PIR – summary of identified issues for discussion • Doc 1 – CASR issues • Doc 2 – 66 MOS issues • Doc 3 – 66 AMC/GM issues • Doc 4 – licence privilege issues • Doc 5 – Aeroskills training issues • Doc 6 – possible new policies issues • Full B1.1 LAME – B2 certification decision flowchart (related to issues 4, 6 & 7 – Doc 2) <u>Reference documents</u> • Part 66 MOS • Part 66 of CASR • Part 66 AMC/GM • Related Part 66 Advisory Circulars • Comparison of licence privileges – CAR 31 to CASR Part 66 • EASA regulation – Annex III (Part 66) • EASA – Easy Access Rules for Continuing Airworthiness

Attendees:

CASA	Industry
Mick McGill CASA Airworthiness Standards (Part 66 project leader)	Keith Blaik individual LAME – GA sector
Craig Johnson CASA Maintenance Personnel Licensing Services Team (MPLST)	Rod Tomlins individual LAME – RPT sector
Matt Castello CASA Maintenance Personnel Licensing Services Team (MPLST)	Mary Brown Nth Qld Aviation Services (AMO small GA maintenance org)

Saskia Ford CASA Northern Region - Darwin office	Wayne Davey Newcastle Helicopter Engineering (AMO small GA helicopter maintenance org)
Mark Hinchliffe CASA Western Region - Perth office	Ted Goetz QANTAS (AMO large RPT maintenance org)
Sam Palaskonis CASA Client Services Centre	Stephen Re Australian Licensed Aircraft Engineers Association (ALAEA)
Peter Ball CASA Aviation Safety Adviser	Mark Thompson Aviation Australia (Part 147 ATO delivering both CASA & EASA training)
Matthew Bouttell CASA Industry Relations	Steven Wright individual LAME and maintenance training consultant
	Jared Smith RA Aus

Meeting Agenda

Day 1

8:30 – 9:00   Informal meet and greet

9:00 – 9:15   Welcome
                       Matt Bouttell

9:15 – 9:30   Outline and tasking/expectations for ASAP TWG
                       Matt Bouttell

9:30 – 10:30   Discussion of issues & possible solutions (Doc 1 & Doc 2)

- Part 66 Regulation issue — issue No: 1 (ref Doc 1)
- Part 66 MOS issues — issues No: 2 thru No: 15 (ref Doc 2)

Morning tea (15 min)

10:45 – 12:30   Progress discussions of Part 66 MOS issues & solutions

<u>Lunch</u> (45 min)

13:15 - 15:30   Progress discussions of Part 66 MOS issues & solutions

<u>Short afternoon break</u> (10 min)

15:40 – 16:30   Progress discussions of Part 66 MOS issues & solutions

Day 2

9:00 – 10:30   Discussion of issues & possible solutions (Doc 3 & Doc 4)

- Part 66 AMC/GM issues — issue No: 16 & No: 17 (ref Doc 3)
- Licence privilege issues — issues No: 18 thru No: 26
  (ref Doc 4)

<u>Morning tea</u> (15 min)

10:45 – 12:30   Progress discussions of licence privilege issues & solutions

<u>Lunch</u> (45 min)

13:15 - 15:30   Progress discussions of licence privilege issues & solutions

<u>Short afternoon break</u> (10 min)

15:40 – 16:30   Progress discussions of licence privilege issues & solutions

Day 3

9:00 – 10:30   Discussion of issues & possible solutions (Doc 5 & Doc 6)

- Aeroskills training issues — issues No: 27 thru No: 35
  (ref Doc 5)
- Part 66 possible new policies — issues No: 36 thru No: 40
  (ref Doc 6)

Morning tea (15 min)

10:45 – 12:30   Progress discussions of Aeroskills training issues & solutions

Lunch (45 min)

13:15 - 14:00   Discussion of Part 66 possible new policies issues & solutions

14:00 – 15:00   Initial drafting of TWG report for ASAP

	CASR PART 66 TWG 4-6 April 2018					
This list of issues captured during the TWG where CASA has or may consider during the review of Part 66						
Issue No	**ISSUE TOPIC**	**ISSUE SPECIFICS**	**REG/MOS REFERENCE**	**RESOLUTION OPTIONS**	**RESOLUTION DECISION**	**COMMENTS**
1	Recent qualification or experience requirements of a licence	• 66.120 (2) (b) of CASR text differs from EASA & ICAO text (they refer to maintenance experience, whereas our legislation refers to exercising the privileges of a licence), plus doesn't account for individuals working in affiliated maintenance roles e.g. maintenance watch, training lecturer roles, etc	• 66.120 (2)(b)/ 66.A.23 of MOS	Align 66.120 (2) (b) to EASA & ICAO.	• Align 66.120 (2) (b) to EASA & ICAO, and include time spent in affiliated maintenance roles towards satisfying the 6 in 24 requirement	
2	Definitions in 66 MOS	• Definitions need clarification e.g. simple test	• 66.5 of MOS	Clarify B1 privileges into the B2 domain. Clarify B2 privileges. Amend definition of a simple test	• Consensus that some LAMEs are possibly working out of scope • Produce a 'statement' that clarifies the intent of the policy around a simple test/ B1 privilege • Produce flowcharts that clarify what privileges each licence has • Review the other definitions (e.g. subsystems) for clarification • EASA 10 step – possible solution that needs further discussion offline (as a possible option)	
3	Statement of privileges on the licence (incl exclusions)	• Statement of privileges not clearly described in the MOS. Exclusions need refining	• 66.A.20 of MOS	Clarify privileges	• Produce a comms package (incl education booklet) that clarifies the privileges of a licence – for existing policies • Roadshow industry	
4	Avionics privilege – B1 LAME	• Avionics privilege for B1 LAME not clearly described	• 66.A.20 (a) 4. (ii) (B) of MOS	Clarify LRU privilege	• Clarify the privilege and intent (full B1 & B1 with exclusions), possibly with a flowchart diagram.	Park the issue
5	Cat A licence privileges under the B1 licence	• Why are category A licence privileges included under B1 privileges when the scope of the B1 licence includes category A licence tasks	• 66.A.20 (a) 4. (ii) (C) of MOS	Clarify LRU privilege	• Amend the wording to match EASA	
6	B1 licence privileges – functional checks of avionics systems	• Functional checks of avionics systems privilege not clearly understood by industry	• 66.A.20 (a) 4. (ii) (D) of MOS	Related to issue 4	• See issue 4	Park the issue
7	B1 licence privileges	•	•	Related to issue 4	• See issue 4	Park the issue
8	Composite repairs	• 6 MOS does not mention repair privileges of composites for the B1 LAME	• 66.A.20 of MOS		•	Park the issue – will be covered under Part 145 PIR (specialist maintenance)
9	B2 privileges into mechanical ATA chapters	• B2 should be able to carry out and certify for functional checks and troubleshooting in the mechanical systems	• 66.A.20 (a) 6. (ii) of MOS	Clarify B2 privileges or leave MOS as is	• Provide additional information in Table 1 of 66 MOS that clarifies the B2 privileges of the subsystems of mechanical systems (ATA Chapters) • Look at EASA wording • Already covered under 66.A.20 (a) 6 (ii) (B)	Issue already addressed under 66.A.20 (a) 6 (ii) (B) of the MOS Park the issue
10	B2 privileges – category A tasks	•	• 66.A.20 (a) 6. (ii) (C) of MOS		• Consensus is that this is not an issue for this group (more of an Part 145 AMO issue)	No change to MOS required
11	ATA Chapters in Table 1 of 66 MOS	• Suggestion for use of alternative JASC system in lieu of ATA chaptering in the MOS	• Table 1 of MOS		• Review existing terminology used for ATA chapters in Table 1 of MOS • No to JASC option	Issue resolved

		CASR PART 66 TWG 4-6 April 2018				
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Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
12	Requalification requirements for a licence	• Requalification requirements not easily understood by industry	• 66.A.23 of MOS	Related to issue 1	• Related to issue 1	
13	Adding a category/subcategory to an existing licence	• Lack of clarity in MOS around 'practical experience' requirements when adding a new category/subcategory to an existing licence	• 66.A.30 (b) of MOS	Provide clarity	• Add a matrix table (similar to EASA's) into the MOS • Review EASA matrix • Calendar time • Harmonise with EASA	
14	General 66 MOS issues	• Complexity of information contained in the MOS • MOS is too onerous and too long and too complex	• Whole of MOS - generally		• Simplify the content in the MOS	
15	CASA knowledge syllabus – Module 10	• Current Module 10 does not cater for GA AME needs for operational and airworthiness requirements – suggest update to module 10 required	• Part III of Appendix I of MOS	Update Module 10	• Create a sub-topic within Module 10 that covers CAR 30 so that when CAR 30 ceases to exist, this sub-topic can be removed • Currently MTOs are teaching CAR 30 but the Module10 syllabus within the MOS does not cover the topic	
16	Part 66 AMC/GM and ACs	• Part 66 AMC/GM and associated AC documents are not easily understood by industry	• Whole of 66 AMC/GM doc - generally	Full review of content of these docs	• Review and simplify information in these documents • Merge the information into an appendix within the AMC/GM rather than have separate ACs	
17	Composite maintenance	• Inconsistency of information on composite maintenance contained within many CASA advisory documents	• CAO100.5 • AC66-04 • AAC9-0 • Part 66 MOS	Review all docs and update information	• Review all docs and update information to ensure consistency • Reduce the number of documents that hosts this information • Review content of MEA339 (IRC) • Place info into an appendix of AMC/GM doc	
18	Licence exclusions	• Licence exclusions not easily understood by industry	• 66.A.70 of the MOS		• Education/comms medium that explains exclusions required e.g. info on CASA's Youtube channel • Exclusions listing needs to be in the MOS	
19	Avionics LRU privileges	• Avionics LRU privileges for B1 LAMEs not easily understood by many existing licence holders and maintenance organisations	• 66.A.20 (a) 4 (ii) (B) of MOS	Related to issue 4	• Related to issue 4	
20	B1 licence privileges	• certification scope of the full B1 licence into the category B2 domain not clearly understood by industry	• 66.A.20 of MOS	Related to issue 4	• Related to issue 4	
21	B1 licence privileges — composite structures maintenance (inspection & repair)	• clarification of inspection and repair privileges for aircraft composite structures is required in the 66 MOS	• 66.A.20 (a) 4 (ii) (G) of the MOS	Related to issue 8	• Related to issue 8	
22	B1 restricted licence privileges — VFR/IFR split (not a full B1 problem)	• clarification around B1 LAME privileges for VFR/IFR needed in the 66 MOS	• 66.A.21 of the MOS (Table 2)		• Add clarity in the MOS on this item (including why) • Related to issue 40	

This list of issues captured during the TWG where CASA has or may consider during the review of Part 66

Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
23	B2 licence privileges	• clarification of B2 licence 'core privileges' is needed	• 66.A.20 (a) 6 of the MOS	Related to issue 9	• Add a note in the MOS to clarify daily inspection privileges under 66.A.20 (a) 6A (see note under CAO 100.90) • Check EASA	
24	B1 licence - scope of privileges (GA	• grant mechanical, structures, propeller, electrical and avionic certifications, across the subcategories for non-type rated aircraft (i.e. B1.1/B1.2 or B1.3/B1.4). The only significant difference in each subcategory is the powerplant	• 66.A.20 (a) 4 of the MOS		• Would need to be a change in CASA policy. The current Part 66 structure does not provide this outcome without doing the required training for each licence category	Park the issue to remain aligned with EASA
25	B2 licence - scope of privileges (GA)	• grant across the board privileges for off-the-shelf avionics systems.	• 66.A.20 (a) 6 of the MOS		• Would need to be a change in CASA policy. The current Part 66 structure does not provide this outcome without doing the required training for each licence category	Park the issue to remain aligned with EASA
26	Licence privileges of transitioned LAMEs in the GA domain	• remove the restriction on licence privileges of a transitioned LAME with regards to periodic inspections of VFR aircraft	• 66.A.21 of the MOS (Table 2)		• Related to issue 40 • Needs clarification • Remain aligned with EASA	Issue to be discussed out of session
27	The training requirements for Part 147 MTOs	• Aeroskills training package requires improvement/restructuring • issues of incompatibility between CASA/EASA knowledge syllabus (Appendix I of 66 MOS) versus the MEA training package units of competency requirements	•		• Deliver CASA's goals for aligning of the training (through a letter) to the IRC (including timeframes for when the review of the training needs to be completed) • Need to ensure the practical experience requirements align with the knowledge module requirements • Align the CASA & EASA knowledge syllabuses • Align the CASA/EASA certificates (i.e. CASA approved form – [yet to be produced] should look the same as the EASA form that reports training outcomes) • Align with EASA/ICAO competency requirements	
28	Current licence system	Current licence system is not progressive • we need a progressive licensing system (similar to CAR 31) that enables the licence to be built up through completion of training subjects/exams/and gaining of practical experience in the category o the training package needs to be sensibly structured to provide this model	•		• communication	Discussion covered under other training issue topics
29	Current standard and content of training	• the current standard and content of training is a serious concern to the industry. Apprentices are not receiving the required knowledge from the MTO/RTO o this is evident when the apprentice is completing practical tasks in the hangar environment	•		• Aerospace IRC's review/restructure of the existing Aeroskills training package will ensure the structure of the training satisfies the ICAO requirement for training of AMEs/LAMEs and more closely aligns to the EASA training requirements.	

		This list of issues captured during the TWG where CASA has or may consider during the review of Part 66				
Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
		• the content within the Aeroskills training package is inadequate and outdated in areas				
30	Cost of training	• cost of LAME training is far too expensive and comparable to the cost to get a doctor/lawyer's degree • cost of training engineers to achieve multi-category licences and multi-type ratings is now cost and time prohibitive to the industry as a result of the new type ratings under Part 66, this includes exclusion removal	•		•	Not an issue that can be addressed by this TWG
31	RPL processes	• should not be done by Part 147s (CASA should conduct RPL), as it is seen as a conflict of interest for the 147 • Part 147s make money from delivering training, so will always advise you fell short in the RPL process so they can offer some additional training • Australian Part 147 RPL processes are inefficient, confusing and expensive	• Part 147 MOS		• Aligning the UOCs more accurately to the knowledge modules will make RPL processes easier.	Not an issue that can be addressed by this TWG
32	Gaining a subsequent aircraft type on an existing licence	Requirements to gain subsequent aircraft type ratings are too simplistic • not enough 'theoretical' detail covered by the type course • practical aspect of the training is light on • Part 147 practical training is a joke	• 66.A.45 of MOS		• CASA to look at amending our legislation to see if CASA can accept OEM/EASA type training that the foreign NAA has accepted as meeting their training standards, as also satisfying our 'training standards' requirements	
33	Helicopter type training courses	Industry need helicopter type training course and exclusion removal course availability for older helicopters such as the B222, B105, B412 etc where there is no CASA approved training available. • to get a type rating on a CASA Part 66 licence, you are required to have completed a CASA approved training course • CASA will not recognise some OEM training courses, however most of them are FAA, EASA and/or Transport Canada approved • in many NAAs, training courses need to be approved by either the OEM or by a recognised country • why are CASA's requirements different from most other NAAs? Benefits:	• 66.A.45 and 66.A.50 of MOS		• Permitted training (CAO104) is currently available to address the issue • Need some guidance/information to inform industry (comms) on permitted training • Add information onto CASA website	Discussed and related to issue 32

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Issue No	**ISSUE TOPIC**	**ISSUE SPECIFICS**	**REG/MOS REFERENCE**	**RESOLUTION OPTIONS**	**RESOLUTION DECISION**	**COMMENTS**
		• tremendously benefit the operators of legacy helicopters for which there is no CASA approved Part 147 course available if courses approved by foreign NAA's could be approved. Even better if an EASA or FAA approved course would be admissible without having to seek approval (At the end, we are all using the same Maintenance Documentation) • would also benefit all the LAME's that have obtained their Part 66 licence after June 2011 that have no grandfathered ratings, as they have to pass a CASA approved training course for every rating they have to get on the licence (As mentioned, no CASA approved course = no maintenance) • removing the restriction to have a Part 147 course CASA approved would allow LAME's to get trained and rated on legacy aircraft still operated in Australia • this certainly would benefit safety in maintenance and operation of these aircraft				
34	OJT and PCT training	• currently there's no Part 145 AMO/Part 147 MTO's providing OJT to licensed aircraft maintenance engineers (LAME) and not a lot of interest to do so from my inquiries • this has effectively stopped career progression of upcoming LAME's only to make current LAME's on the CAR30 system more valuable, who are able to continue with having type ratings endorsed on their respective licenses while LAME's under the new system careers sit stagnant until time AMO/MTO's develop OJT journals	• 66.A.55 of MOS		• The issue is not an accurate statement, OJT/PCT training is being offered by some Part 145s/147s	Not an issue
35	Permitted training	• expand permitted training provisions to cater for all non-RPT aircraft	• Part 147 MOS		• CAO104 (permitted training) is the option available to address the issue where there is no training available for a particular aircraft type • Comms needed to provide additional information to industry on this topic	CASA to follow up with author of issue (see submission) for further information

	CASR PART 66 TWG 4-6 April 2018					
	This list of issues captured during the TWG where CASA has or may consider during the review of Part 66					
Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
36	CASA Part 66 harmonisation with EASA Part 66	CASA Part 66 system not fully aligned/harmonised to EASA Part 66 system • suggest full harmonisation of CASA Part 66 to EASA Part 66	•		• The policy objective of this Part 66 review is to align wherever possible with the aircraft maintenance engineer (AME) licensing standards of EASA.	Policy issue to be discussed further offline by CASA

37	Specialist maintenance	• no clear CASA policy on maintenance tasks that are labelled as "specialist maintenance"
		• NDT, structural repair, welding etc. are common maintenance tasks that are regularly carried out on all classes of aircraft. There is no need to treat these as specialist maintenance
		  o these maintenance tasks should be carried out by or under the supervision of a licensed engineer
		  o if not practical to include training for such maintenance under existing B1 mechanical category licence then CASA should explore the possibility of creating another category of licence called 'structures' to cover these types of maintenance
		  o the structures category licence may have separate subcategories for NDT, welding, sheet metal and/or composite repairs etc
		  o an individual may specialise in one or more of these subcategories
		  o an existing B1 mechanical licence holder should have an easy pathway to a structures category licence as they would already possess some of the basic competencies
			• Part 147 MOS		• To be discussed as part of the PIR review for Part 145 (predominately a Part 145 issue)	Not an issue that can be addressed by this TWG

38	Part 66 licence examinations	Part 66 licence examinations
		• access by industry
		  o industry access to Part 66 licence examinations via RTOs/Part 147 MTOs is limited
		    ▪ currently more exam centre locations available to do CASA
			•		• Issue addressed in previous discussions	• Policy issue to be discussed further offline by CASA
						• Issue was discussed by the group

This list of issues captured during the TWG where CASA has or may consider during the review of Part 66

Issue No	ISSUE TOPIC	ISSUE SPECIFICS	REG/MOS REFERENCE	RESOLUTION OPTIONS	RESOLUTION DECISION	COMMENTS
		Basics than for Part 66 exams, so where is the incentive for industry to accept the Part 66 training system • CASA's control of examinations o repatriate the administration/control of Part 66 licence examinations back to CASA, but use a contracted third party supplier to manage the exam delivery and question bank				
39	Installation/removal of role equipment	• the regulations, both CARS and CASRs do not currently contemplate installation/removal of role equipment, except as a function of a LAME licence within the privileges and limitations as set out under Part 66 MOS	•		• MEA 301 generally covers this topic • Need further clarification/additional information from issue author to address the issue • N/A not really a Part 66 issue • Does the author want installation/removal of role equipment specifically included in the Part 66 privileges?	• Policy issue to be discussed further offline by CASA • Park the issue – further investigation of issue required
40	Application of E1, E4, E5 & E6 exclusions to small aircraft maintenance	• I have previously demonstrated that the group 1 Airframe licence syllabus adequately covered the E, I & R theory for the purpose of certifying small aircraft • E1, E4, E5 & E6 exclusions should not apply to small aircraft maintenance for the same reasons	•		• Need further clarification/additional information from issue author to address the issue	• Policy issue to be discussed further offline by CASA • Park the issue – further investigation of issue required