



Australian Government

Civil Aviation Safety Authority

Notice of Proposed Rule Making

A Proposal to Modernise Rules for the Licensing of Maintenance Personnel for Small Aircraft

Addition of a small aircraft licence category in
the proposed CASR Part 66 (as foreshadowed
in NPRM 0604MS)

This NPRM will be of interest to:

Maintenance Organisations, Maintenance Training Organisations, Licensed Aircraft Maintenance Engineers (LAMEs), Airworthiness Authority holders, Registered Operators, Certificate of Registration holders, Holders of Air Operators Certificates and their personnel, Authorised Persons, Pilots, and other people carrying out aircraft maintenance.

Issued as part of the process of public consultation by
CASA's Regulatory Development Management Branch

Document NPRM 0804MS – May 2009

Foreword

Context of this NPRM

The purpose of this Notice of Proposed Rule Making (NPRM) is to publicly consult a proposal to:

- introduce a new small aircraft licensing structure into the proposed Civil Aviation Safety Regulation (CASR) Part 66;
- re-align licence structures to ensure best “fit” with the Aerial Work and General Aviation sector; and
- provide for an initial Aircraft Maintenance Engineer (AME) licence that covers the majority of small aircraft.

In this NPRM, any reference to a small aircraft licence means the proposed B3 or B3/B4 licence structures as detailed in Section 3.

Small aircraft are:

- aeroplanes (excluding turbojet powered) with a maximum take-off weight (MTOW) of 5700 kg or less; and
- single-engine helicopters.

Background

In 2006 NPRM 0604MS introduced maintenance regulations based on the European Aviation Safety Agency (EASA) Parts M, 66, 145 and 147 as follows:

- Part 42 – Continuing Airworthiness (EASA Part M);
- Part 66 – Maintenance Personnel Licensing;
- Part 145 – Approved Maintenance Organisations; and
- Part 147 – Maintenance Training Organisations.

At the time of publishing NPRM 0604MS, the Civil Aviation Safety Authority (CASA) foreshadowed further development work on a small aircraft licence structure to mesh with and supplement the proposed A/ B1/B2 /C licence structures.

This NPRM is the outcome of that further development work and describes proposals for a suitable licence structure and its inclusion in the draft CASR Parts 42, 66, 145 and 147.

The purpose of this NPRM is to invite members of the aviation community and the public to comment on the proposals.

Small aircraft in Australia - aeroplanes

82% of small aeroplanes in Australia are single-engine piston-powered aeroplanes with fixed undercarriage. Of these, the majority are of all-metal construction.

There are however, a significant number of composite aircraft in the fleet and more are coming on line as more “traditional” manufacturers take up the technology.

The global growth in small volume manufacturers and a steady increase in the sport aviation segment suggest future growth in wood and fabric types.

Helicopters

Of approximately 1300 single-engine helicopters registered in Australia:

- 70% are piston engine powered;
- 70% have hydraulically powered rotor controls; and
- approximately 60% are of all-metal construction.

Meeting the need

The aim of the proposed licence structure is to ensure that the maintenance needs of the predominant types are catered for within the initial licence(s), and to allow sufficient flexibility to cater for the aircraft that fall outside this general grouping.

The licence structure is also intended to cater for future developments in small aircraft technology and usage.

Proposed Changes in a Page

The **time-conscious reader** will obtain a quick appreciation of this NPRM through the **Proposed Changes in a Page** (NPRM Section 2).

A **text synopsis** of the proposed changes is provided as background (NPRM Section 3).

How you can help us

To ensure clear and relevant safety standards, we need the benefit of your knowledge as a maintainer, aviator, aviation consumer and/or provider of related products and services **by completing the Response Form** (in this NPRM) **and returning it to CASA by 5 June 2009**.

Implementation Schedule

It is intended to include the B3/B4 category in the proposed CASR Part 66 by way of amendment.

I would like to thank you for expressing interest in this proposal and emphasise that no rule changes will be undertaken until all NPRM responses and submissions to this NPRM received by the closing date **5 June 2009** have been considered.



Simon Denby
Group General Manager
Aviation Licensing Group

1 May 2009



Mark Sinclair
Group General Manager
Airworthiness Engineering Group

1 May 2009

Contents

Acronyms	5
1. The Consultation Process	7
What CASA does with your comments	7
2. Proposed Changes in a Page	8
3. Synopsis of Change Proposals	9
3.1 Purpose of this NPRM	9
3.2 Background	9
3.3 Reasons for change	10
3.4 Options considered	13
3.5 Key change proposals	19
3.6 Benefits and impacts of changes	19
3.7 Implementation and review	19
3.8 Proposed transition	19
3.9 General information	20
NPRM Response Form	23

★ YOU CAN RESPOND ONLINE OR BY FAX, POST OR E-MAIL ★

A web-based online response form is offered as an alternative to the printed form in this NPRM. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type casa.gov.au/newrules/ors into your web browser and follow the links for this NPRM.

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Acronyms

AME	Aircraft Maintenance Engineer
AMO	Approved Maintenance Organisation
CAR	Civil Aviation Regulation
CASA	Civil Aviation Safety Authority
CASR	Civil Aviation Safety Regulations 1998
COM	Communications
CRS	Certificate of Release to Service
EASA	European Aviation Safety Agency
FADEC	Full Authority Digital Engine Control
ICAO	International Civil Aviation Organization
INSTR	Instruments
LAME	Licensed Aircraft Maintenance Engineer
MTOW	Maximum Take-off Weight
NAV	Navigation
NFRM	Notice of Final Rule Making
NPRM	Notice of Proposed Rule Making
SOE	Schedule of Experience

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1. The Consultation Process

1.1 This NPRM is issued as part of CASA's regulatory development activities and invites consultation on an addition to rules previously proposed by CASA in NPRM 0604MS.

1.2 For a complete picture, readers may wish to read NPRM 0604MS at CASA's website <http://www.casa.gov.au/newrules/parts/042/download/nprm0604ms.pdf> in addition to this NPRM.

What does CASA do with your comments?

1.3 At the end of the response period for public comments, all submissions will be evaluated and considered.

1.4 Subsequent to the closing date for comments, a Notice of Final Rule Making (NFRM) will be prepared, and made publicly available in conjunction with the making of the final rule.

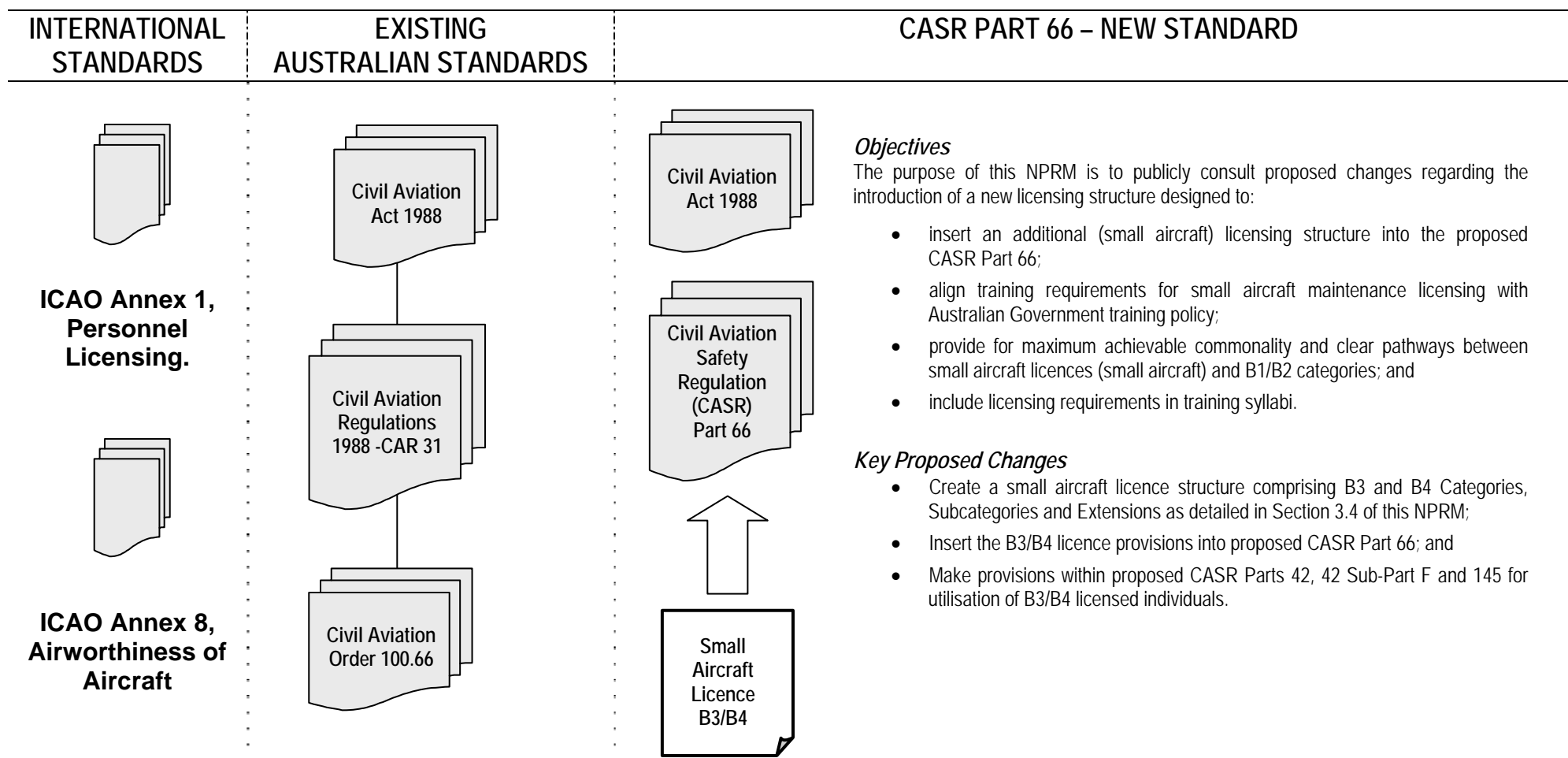
1.5 CASA is required to register each comment and submission received, but will not individually acknowledge a response unless specifically requested. However, the names of respondents will be published in the subsequent NFRM, except where CASA is specifically requested not to do so.

Persons and groups affected

1.6 Together with CASA, the key stakeholders affected by this proposal are:

- AME trainees and apprentices;
- Maintenance Organisations;
- Maintenance Training Organisations;
- Licensed Aircraft Maintenance Engineers;
- Airworthiness Authority holders;
- Registered Operators;
- Certificate of Registration holders;
- holders of Air Operators Certificates and their personnel;
- CASA Authorisation holders;
- Authorised Persons;
- pilots; and
- other people who carry out or certify for maintenance.

2. Proposed Changes In a Page



3. Synopsis of Change Proposals

3.1 Purpose of this NPRM

3.1.1 In developing a new set of maintenance rules for Australia, CASA has consulted extensively with industry and the public via the previously published NPRM 0407MS and then NPRM 0604MS.

3.1.2 After considering Industry responses to the earlier NPRM, CASA introduced NPRM 0604MS and invited consultation on a revised approach to the previously proposed regulatory regime.

3.1.3 At the time of drafting NPRM 0604MS, CASA foreshadowed a further licence category for small aircraft maintenance in order to meet the requirements of the Aerial Work and General Aviation sectors and align small aircraft maintenance licences with Australian Government requirements including education policies, vocational training policies and integration of trade skills and licence training.

3.2 Background

3.2.1 The Chief Executive Officer of CASA, Bruce Byron, directed in late 2005 that future regulatory development be carried out by a joint CASA/Industry team. He said the team was to use advisers, consult with stakeholders, and have a result as soon as possible.

3.2.2 This process was followed in the development of NPRM 0604MS, and it was subsequently decided to form a supplementary (B3) team along similar lines to develop the proposed structures for an additional small aircraft licence category.

Process

3.2.3 The B3 team initially comprised two groups.

3.2.4 The B3 team commenced with the compilation of an Industry Priorities List. The priorities list was used to steer the workings of the team.

3.2.5 Meetings were held between May 2007 and March 2008. A licence proposal was generated and circulated among key stakeholders for comment.

3.2.6 In September 2008, the two groups were amalgamated into a B3 Working Group and the proposed licence structure was re-defined in light of feedback received.

See table 5 (Section 3) for a list of participating organisations.

Consultation

3.2.7 The new proposal was circulated within the B3 Working Group and among industry peak groups for further input at end-user level.

3.2.8 After almost two years of consultation, including industry seminars around Australia, this NPRM is now presented for general public consultation.

3.3 Reasons for change

3.3.1 The maintenance requirements of small aircraft are distinctly different from those of large aircraft and aircraft in airline operations.

3.3.2 A licence structure that would be common to both sectors is regarded as impractical and would impose unjustifiable cost burdens on the Aerial Work and General Aviation sector.

3.3.3 Changes in technology are rapid and continuous, and regulatory structures need to be better able to support timely adoption of new developments that enhance safety, performance, economic or ecological aspects of the industry.

3.3.4 The proposed small aircraft licensing structure is designed to:

- integrate with CASR Parts 42, 66, 145 and 147 policies as proposed in NPRM 0604MS;
- conform to national training policies;
- meet current industry needs; and
- provide flexibility for future developments.

Table 1 – Terms used in this NPRM

Advanced Aeroplane	<p>Aeroplanes with retractable undercarriage, variable pitch propeller(s) and may be piston powered or turbopropeller powered, with simple or complex electrical and avionics systems.</p> <p>A licence in this subcategory confers Certificate of Release to Service (CRS) privileges for</p> <ul style="list-style-type: none"> • the mechanical, structural and powerplant systems with limited CRS privileges in respect of electrical and avionics systems. <p>An engine type rating may be required if the aircraft is turbine powered.</p>
Advanced Electrical	<p>Multi-source DC, and AC systems.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none"> • AC and multi-source DC electrical power generation and distribution systems, and • simple and single source electrical generation and distribution systems.

<p>Advanced Helicopter</p>	<p>A helicopter with powered rotor controls which may be piston or turbo shaft powered, with simple or complex electrical and avionics systems.</p> <p>A licence in this subcategory confers CRS privileges for the</p> <ul style="list-style-type: none"> • mechanical, structural and powerplant systems with limited CRS privileges in respect of electrical and avionics systems. <p>An engine type rating may be required if the aircraft is turbine powered.</p>
<p>Advanced NAV/COM, INSTR</p>	<p>A licence in this subcategory confers CRS privileges for :</p> <ul style="list-style-type: none"> • HF, Integrated Audio, GPS, NAV, IFE, FDR, CVR, ADC, Remote Compass, Advanced INSTR; and • basic avionics systems.
<p>Basic Aeroplane</p>	<p>Single-engine piston powered aeroplane with fixed pitch propeller, fixed undercarriage and simple electrical and avionics systems. This subcategory provides licence coverage for 80% of the Australian small aircraft fleet.</p> <p>A licence in this subcategory confers CRS privileges for the:</p> <ul style="list-style-type: none"> • mechanical, structural and powerplant systems with limited CRS privileges in respect of electrical and avionics systems.
<p>Basic Avionics</p>	<p>VHF COM, non-integrated NAV systems, audio, pressure and vacuum instruments, engine indication instruments, and single source DC electrical systems.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none"> • non-integrated NAV systems, • VHF COM systems, • GPS (non-integrated), • audio, • transponders, • pressure and suction instrumentation • engine indication instruments, • single source DC electrical systems, and • Schedule 8 privileges <p>Does not permit CRS for coupled or integrated systems.</p>
<p>Basic Helicopter</p>	<p>Single-engine piston powered helicopter with non-boosted rotor controls and simple electrical and avionics systems.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none"> • mechanical, structural and powerplant systems with limited CRS privileges in respect of electrical and avionics systems.

<p>Environmental</p>	<p>Air conditioning systems, pressurisation systems, oxygen systems, and cabin heating systems.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none"> • air conditioning, • cabin heating, • oxygen, and • pressurisation systems.
<p>Flight guidance</p>	<p>Includes EFIS, FMS.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none"> • EFIS, and • FMS.
<p>Limited Electrical and Avionics privileges</p>	<p>A licence which includes this phrase confers the following additional CRS privileges:</p> <ul style="list-style-type: none"> • single source DC electrical generating and distribution systems, • electrical and instrument aspects of mechanical systems, • pressure and suction based flight instruments, • avionics LRU not requiring specialist testing equipment, • repairs to avionics interwiring and antenna leads, and • replacement of damaged or defective antennae.
<p>Piston engine</p>	<p>Includes CRS for all piston engine types fitted to small aircraft.</p>
<p>Pulse</p>	<p>A licence in this subcategory confers CRS privileges for all airborne radar systems including:</p> <ul style="list-style-type: none"> • Radar, • Doppler, • Radalt, • DME, • Traffic, • TCAS, and • TAWS.
<p>Schedule 8</p>	<p>This is a generic title covering pilot maintenance privileges which would be available to trainees and apprentices after approximately 2 years.</p> <p>A licence in this subcategory would confer CRS privileges for:</p> <ul style="list-style-type: none"> • those maintenance activities listed by CASA in a schedule of approved pilot maintenance activities.

Turbine engine	<p>All non type rated turbine engines and type rated turbine engines (subject to training and endorsement).fitted to small aircraft.</p> <p>A licence in this subcategory confers CRS privileges for:</p> <ul style="list-style-type: none">• all non type rated turbine engines fitted to small aircraft and those type rated engine types that are endorsed on the licence.
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3.4 Options considered

3.4.1 Options initially considered by the B3 working groups were:

- retain a Civil Aviation Regulation (CAR) 31 style licence;
- adopt B1/B2 licence categories for small aircraft;
- adopt the proposed EASA B3 licence;
- create a small aircraft licence structure to fit Australian requirements; and
- permit licence endorsements to be granted by the employing Approved Maintenance Organisation (AMO).

3.4.2 Out of these considerations, the working group selected the following options:

- Option 1 – B3/B4 – Table 2;
- Option 2 –B3.1- B3.13 –Table 3; and
- Option 3 –B3.1- B3.8 –Table 4.

Option 1 – Table 2 – B3/B4

3.4.3 The subcategories B3.1 - B3.6 are stand-alone subcategories and any one of these subcategories can be an initial licence with the privileges as described in Table 1 above.

3.4.4 The B3 extensions are options that may be added to a B3 subcategory and they confer the privileges as described in Table 1 above. Extensions are not stand-alone privileges.

3.4.5 The subcategories B4.1 and B4.2 are stand-alone licence subcategories and either may be an initial licence. The subcategories B4.3 to B4.8 are not stand-alone and may only be added to a B4.1 or B4.2 subcategory. The privileges that attach to these subcategories are as described in Table 1 above

B3 (Mechanical)
B3.1 Basic Aeroplane
B3.2 Basic Helicopter
B3.3 Advanced Aeroplane
B3.4 Advanced Helicopter
B3.5 Piston Engine
B3.6 Turbine Engine

B4 (Avionics)	
B4.1	Basic Avionics
B4.2	Advanced NAV/COM, INSTR
B4.3	Flight Guidance
B4.4	Advanced Electrical
B4.5	Pulse
B4.6	Aeroplane Autopilot
B4.7	Helicopter Autopilot
B4.8	Environmental

B3 Extensions

1. Hydraulics
2. Retractable
3. Wood/Fabric
4. Composites
5. Aircon/Pressurisation/Oxygen
6. Pneumatics
7. Structures
8. Schedule 8
9. Propellers and Governors
10. Supercharging
11. Diesel/2-Stroke
12. FADEC

Option 2 – Table 3 – B3

3.4.6 The subcategories B3.1 to B3.7 are stand-alone subcategories any of which may be an initial licence, and which confer the privileges as described in Table 1.

3.4.7 The subcategories B3.8 to B3.13 are optional extensions to subcategory B3.7; they confer the privileges described in Table 1 and they are not stand-alone.

3.4.8 The extensions 1-12 are optional additions to the subcategories B3.1-B3.6; they confer the privileges described in Table 1 and are not stand-alone.

B3.1- B3.12	
B3.1	Basic Aeroplane
B3.2	Basic Helicopter
B3.3	Advanced Aeroplane
B3.4	Advanced Helicopter
B3.5	Piston Engine
B3.6	Turbine Engine
B3.7	Advanced NAV/COM, INSTR
B3.8	Flight Guidance
B3.9	Advanced Electrical
B3.10	Aeroplane Autopilot
B3.11	Helicopter Autopilot
B3.12	Environmental
B3.13	Pulse

Extensions
1. Hydraulics
2. Retractable undercarriage
3. Wood/Fabric
4. Composites
5. Aircon/Pressurisation/Oxygen
6. Pneumatics
7. Structures
8. Schedule 8
9. Propellers and Governors
10. Supercharging
11. Diesel/2-Stroke
12. FADEC

Option 3 – Table 4 – B3

3.4.9 The subcategories B3.1-B3.8 are stand-alone subcategories and any one of them may be an initial licence.

3.4.10 Extensions 1-11 are optional additions to subcategories B3.1-B3.6; they confer the privileges detailed in Table 1 and are not stand-alone.

3.4.11 Extensions 12-17 are optional additions to subcategories B3.7 and B3.8; they confer the privileges detailed in Table 1 and are not stand-alone.

Extensions

Basic Structure
B3.1 Basic Aeroplane
B3.2 Basic Helicopter
B3.3 Advanced Aeroplane
B3.4 Advanced Helicopter
B3.5 Piston Engine
B3.6 Turbine Engine
B3.7 Basic Avionics
B3.8 Advanced Avionics

Extensions
1. Hydraulics
2. Retractable
3. Wood/Fabric
4. Composites
5. Aircon/Pressurisation/Oxygen
6. Pneumatics
7. Structures
8. Schedule 8
9. Propellers and Governors
10. Supercharging
11. Diesel/2-Stroke
12. FADEC
13. Oxygen
14. Pulse
15. Autopilots
16. Multi-source electrics
17. Advanced Instruments

Discussion of Options:

Option 1

3.4.12 This is the B3 Working Group's and CASA's preferred option. This structure delineates between the primarily mechanical (B3) and primarily avionic (B4) categories.

3.4.13 The principal benefits of Option 1 are:

- there would be a clear delineation between mechanical and avionics categories;
- an appropriate balance between complexity and flexibility would be provided;
- the small aircraft licences would be aligned with the structure of the proposed B1 and B2 categories;
- there would be simplified applicability and endorsement rules for licence extensions; and
- it would be more analogous to current industry employment practice.

Option 2

3.4.14 This licence format was developed from option 3 and partially addresses the confusion between avionics and mechanical subcategories. Key features include:

- provision of a single licence category;
- flexibility through a mixture of subcategories and extensions; and
- no distinction between mechanical and avionics licence holders would be made other than by numbering.

Option 3

3.4.15 This was the first proposal developed by the joint CASA/Industry B3 Working Group. It met the required parameters that were drawn up by the group, but the commingling of mechanical and avionics subcategories and extensions was considered to be confusing. Key features include:

- basic objectives drawn up by the B3 Working Group would be met;
- a high level of flexibility would be provided by supplementing a small number of subcategories with an extended range of extensions; and
- the high level of flexibility would bring some complexity issues - (there would be a high number of licence extensions).

The proposal is to include a licence structure based on Option 1 in the proposed CASR Part 66.

Licence prerequisites (all options)

3.4.16 In order to qualify for a B3 or B4 licence, an applicant will be required to demonstrate that he or she:

- is over 18 years of age;
- has been assessed by a CASR Part 147 Organisation as meeting the applicable competency requirements including the required underpinning knowledge modules;
- has attained 3 years aviation maintenance experience (inclusive of training); and
- possesses the necessary English language skills.

Note: The 3 year experience requirement is not necessarily applicable to the Schedule 8 privileges.

Privileges of a B3/B4 licence

3.4.17 The privilege of a B3/B4 licence is certifying for maintenance and/or issuing a Certificate of Release to Service (CRS) for small aircraft.

3.4.18 Small aircraft are:

- non-turbojet aeroplanes with a MTOW of 5700 kg or less; and
- single engine helicopters.

3.4.19 The basic and advanced aeroplane licences will include CRS privileges for metal, wood, fabric, and composite aircraft, not including structural repairs or replacement of full fabric envelopes.

3.4.20 The basic and advanced helicopter licences will include CRS privileges for composite airframes not including structural repairs.

3.4.21 The privileges of a B3 or B4 licence may be exercised in an AMO provided that the Licensed Aircraft Maintenance Engineer (LAME) has been authorised to do so in accordance with the organisation's CASA approved Exposition.

3.4.22 The privileges of a B3 or B4 licence may also be exercised outside of an AMO within limitations that will be published as an Appendix to CASR Part 42.

3.4.23 The B3 licence engine subcategories will provide for turboshaft and turbopropeller engine type ratings where required.

3.4.24 Typically, aircraft type ratings will not be required in respect of small aircraft.

3.5 Key change proposals

3.5.1 Create a small aircraft licence category using Option 1 as outlined in this document to form part of the proposed CASR Part 66.

3.5.2 Insert the small aircraft licence category into proposed CASR Part 66.

3.5.3 Make provisions within proposed CASR Parts 42 (Sub-Part F) and 145 for utilisation of small aircraft licensed individuals.

3.6 Benefits and impact of changes

3.6.1 The licence structure will provide maximum industry sector coverage within initial licence scope.

3.6.2 Apprentices will benefit from increased flexibility allowing a wide range of training options.

3.6.3 Training will be relevant to the industry sector in which the apprentice is employed allowing better targeting of skills development.

3.6.4 Employers will benefit from the licence structure flexibility which allows an initial licence to be obtained after 3 years.

3.6.5 The availability of Schedule 8 privileges after approximately 2 years will benefit employers of eligible employees.

3.6.6 Licence issue will occur upon successful completion of training. This will benefit apprentices and employers by eliminating the existing post-training requirements to undergo CASA basic examinations and CASA assessment of Schedule of Experience (SOE).

3.7 Implementation and review

3.7.1 It is proposed to incorporate the B3/B4 licence into CASR Part 66 upon completion of the requisite consultation and approval processes.

3.8 Proposed transition

3.8.1 Existing LAMEs will retain existing privileges when their licences are converted to the proposed new format.

3.8.2 Upon implementation of the new licence structure, a 4-year phase-in period will commence during which time CASA will continue to offer basic examinations and SOE assessments for existing applicants, in parallel with the take-up by training organisations of the new CASR Parts 66 and 147 processes.

3.8.3 Individuals who had commenced doing basic examinations prior to the implementation date will be able to continue with the process and gain a CAR 31 licence which will then be transitioned to a CASR Part 66 licence in the same manner and with the same protection of privileges as existing licence holders.

3.9 General information

Australian Training Requirements

3.9.1 Competency based training and assessment is Australian skills training policy and will be the Australian method of qualifying for initial issue of a CASR Part 66 licence.

3.9.2 Council of Australian Governments (COAG) has adopted a policy that skills training should include any necessary licence knowledge in order that successful completion of training leads to a licence result without further testing/training requirements.

Maintain vs Certify

3.9.3 In line with global practice, a CASR Part 66 licence structure is a licence to perform certifications for maintenance of aircraft and issue CRS.

3.9.4 A CASR Part 66 licence will not necessarily be required in order to perform maintenance however some maintenance certifications may only be made by CASR Part 66 licence holders, in particular, CRS.

3.9.5 It may generally be said that a CASR Part 66 licence holder is permitted by that licence to perform maintenance within the scope of the licence (subject to CASR Parts 42 and 145).

3.9.6 Readers should refer to proposed CASR Parts 42 and 145 in NPRM 0604MS for complete details of the requirements for performing/carrying out and certifying of maintenance.

3.9.7 In order to ensure maximum effectiveness of the new AME licensing proposals, CASR Parts 42 and 66 will include provisions for CASA to make determinations in respect of whether a particular aircraft type is to be treated as a large or a small aircraft (regardless of MTOW and/or number of engines) and whether or not a particular aircraft type requires to be type rated for maintenance licensing purposes. A set of determination criteria and guidelines will be developed and included in the respective CASR Maintenance Parts or guidance material.

3.9.8 Determination considerations will take into account aviation complexity factors including certificated maximum passenger seating capacity, operational ceiling, multi-crew requirements, design philosophy, systems complexity, engine type, and technology such as fly-by-wire control systems.

Table 5 – B3 Working Group

Maintenance providers (AMROBA, Hawker Pacific)
Aircraft operators (maintenance consumers)
Training provider
Competencies advisor representing Manufacturing Skills Australia (MSA)
CASA
Other government agencies
Aircraft Maintenance Employee representatives (ALAEA, AEA)
Regional airlines
Agricultural aviation (AAAA)
Helicopter operators
Aircraft Owners and Pilots Association (AOPA)
Recreational/Sport Aviation
Ex-military aircraft operators
Historical aircraft owners
Insurance Providers

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NPRM Response Form

A PROPOSAL TO MODERNISE RULES FOR THE LICENSING OF MAINTENANCE PERSONNEL FOR SMALL AIRCRAFT – PROPOSED B3 or B3/B4 LICENCE CATEGORY IN PROPOSED CASR PART 66

**Please complete your response by 5 June 2009 and return it
by one of the following means:**

Online (preferred method) casa.gov.au/newrules/ors

Fax 1800 653 897 (free call)

Post (no stamp required)
CASA Regulatory Development Management Branch
Reply Paid 2005
Canberra ACT 2601, Australia

E-mail nprm0804ms@casa.gov.au

* A web-based online response form is offered as an alternative to the printed form in this NPRM. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type casa.gov.au/newrules/ors into your web browser and follow the links for this NPRM.

Your Details

Please provide relevant information below and indicate your acceptance or otherwise of the proposal presented in this Notice of Proposed Rule Making by ticking [✓] the appropriate boxes.

Your name: _____ ARN* (if known): _____

Organisation: _____ ARN* (if known): _____

*Aviation Reference Number, usually your CASA-issued licence or certificate number

Address: _____

Your telephone number (optional): _____ (to enable the Project Leader to contact you as necessary)

Do you consent to have your name published as a respondent to this NPRM? YES [] NO []

Signed: Date:

How are you responding to this questionnaire/proposal, i.e. whose views are represented in your response?

- | | | | | | |
|---|---|--|---|---|--------------------------------|
| <input type="checkbox"/> Private individual | <input type="checkbox"/> Aviation industry body/association | <input type="checkbox"/> Staff association/union | <input type="checkbox"/> Government agency/authority/department/council | <input type="checkbox"/> Aviation business owner/service provider | <input type="checkbox"/> Other |
|---|---|--|---|---|--------------------------------|

Please advise your main involvement in aviation:

- | | | | | | |
|---|---|---|---|---|---|
| <input type="checkbox"/> Passenger/public consumer of aviation services | <input type="checkbox"/> Air crew for passenger-carrying activities | <input type="checkbox"/> Air crew for non-passenger-carrying activities | <input type="checkbox"/> Ground support for passenger-carrying activities | <input type="checkbox"/> Ground support for non-passenger-carrying activities | <input type="checkbox"/> Other (specify below*, e.g. parachutist) |
|---|---|---|---|---|---|

* **Details:** _____

Are you satisfied with CASA's consultation on this issue?

- Very satisfied Satisfied No opinion Dissatisfied Very dissatisfied

Key Change Proposals (refer to NPRM Section 3)

CASA invites you to advise your comments on the subject matter proposed in this NPRM by indicating your preference by ticking [✓] the appropriate box and commenting below:

Create a B3/B4 Option 1 licence structure comprising Subcategories and Extensions as detailed in Section 3.4 including Table 2 of this NPRM

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable):

Insert the B3/B4 licence provisions into proposed CASR Part 66

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable):

Make provisions within CASR Parts 42, 42 Sub-Part F and 145 for utilisation of B3/B4 licensed individuals

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable):

Additional information is available from:

Mick English, B3 Project Leader

Post (no stamp required) Reply Paid 2005

General Aviation Operations Group

Civil Aviation Safety Authority

Canberra ACT 2601, Australia

E-mail mick.english@casa.gov.au

Telephone 02 6217 1184 or 131 757 (for the cost of a local call)

International +612 6217 1184

Fax 02 6217 1443

International +612 6217 1443