

# **EASA policy for type training one aircraft type to two different licence (sub)categories -EASA policy regarding differences training for different licence (sub)categories for the same aircraft type.**

## **Introduction**

This email is to inform all NAAs of the EASA policy for type training in one aircraft type with respect to two different licence (sub)categories. Please share it with involved colleagues.

This in particular addresses combined B1 + B2 type training courses and differences type training between two licence (sub)categories for one aircraft type. It is frequent to find combined B1.1 + B2 type training courses and courses for the B2-only elements for candidates who previously completed the B1.1 training or have the aircraft type already endorsed on the licence for the B1.1 subcategory. Such possibilities are not described in the regulation.

The need for standardisation emerged during discussions in the MTOAP meeting (coordinating the oversight of Part-147 organisation approved by EASA, outside the Member States), where it was mentioned that the rule does not cover these cases and we subsequently saw different approaches between (licensing) authorities.

After internal discussion within the Flight Standards Directorate of EASA (sections dealing with Rulemaking, Foreign Part-147 approvals and Standardisation) we agreed on the following EASA policy, to assist the NAAs in a uniform interpretation and application:

In general the policy extends the approach already existing for differences training for

### **different aircraft types in the same licence (sub)category**

to the case of differences training for

### **different licence (sub)categories for the same aircraft type.**

This allows to reduce the total training time by integrating or combining and splitting the type training for one aircraft type in different licence (sub)categories.

This can result, for example, in a stand-alone differences course for the “B2-only” elements of an aircraft type (compared to the B1.1 type training), lasting as little as one additional week. Provided this short duration is – as always – justified by a proper Training Needs Analysis (TNA) by the Part-147 organisation.

Candidates applying for the endorsement of the particular type rating in the B2 Part-66 licence with such differences course need to have also:

- full type training for B1.1 started and completed at any Part-147 organisation within the last 3 years or
- the aircraft rating already endorsed in the Part-66 licence for B1.1 subcategory at any time previously.

## **In more detail this means the following:**

### **For Part-147 approval**

Differences training for differences in type training between categories for a particular aircraft type can be approved when the Part-147 organisation:

- is approved for the full type training course in **each category**,
- has established the differences based on the **valid** requirements (**Part-66 Appendix III**) as a minimum.
- fully **meets the requirements** of Part-66 and Part-147 for these differences. This includes MTOE
- procedures (1.9 list of approved courses and Part 2 Training and Examination Procedures), applicable

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- OSD, TNA and approved syllabus or procedure to define differences training,
- **clearly identifies in its Certificates of Recognition (Form 149)** what the course constitutes of. The Part-147 organisation can choose in its MTOE how to specify the courses as long as it is clear and justified. Examples for a full combined course and a stand-alone ad-on course are:
  - Airbus A320 (CFM56) Combined B1+B2 Theoretical & Practical
  - Airbus A320 (CFM56) B2 differences training from B1.1 to B2 Theoretical & Practical (Add-on training or standalone training for B2 elements of the type training only.)

### **For the Part-66 licence endorsement**

The licensing authority should accept such Certificates of Recognition (CoR) and endorse the aircraft rating in the new category in the license when satisfied that all requirements are complied with (Part-66.B.115). The approach should be the same approach for any kind of CoR. Unclear CoR's should be discussed with the organisation and the approving authority and be amended or clarified and accepted.

Example of B2 type endorsement, based on differences training:

- the CoR certifies for the particular aircraft type:
  - ✓ **differences training for B2** (started and completed within three years prior to B2 rating endorsement application) combined with prior aircraft rating endorsement for B1 (B1 rating endorsement performed at any time prior to B2 rating endorsement application)
  - ✓ **differences training for B2** combined with a CoR for Full B1 training course (both started and completed within three years prior to B1 and B2 rating endorsement application) or,
  - ✓ **combined B1 + B2** training course (started and completed within three years prior to B1 and B2 rating endorsement application),
- for On the Job Training (OJT) the approach is the same. For the example of the first type endorsement in the B2 category, the following options exist:
  - ✓ **differences OJT for B2** (started and completed within three years prior to B2 rating endorsement application) combined with a prior aircraft rating endorsement for B1 (B1 rating endorsement performed at any time prior to B2 rating endorsement application), or
  - ✓ **differences OJT for B2** combined with demonstration of OJT for B1 (both started and completed within three years prior to B1 and B2 rating endorsement application) or,
  - ✓ **combined B1 + B2 OJT** (started and completed within three years prior to B1 and B2 rating endorsement application),
- of course endorsement can also follow upon demonstration of the full B2 training course and full B2 OJT (started and completed within three years prior to B2 rating endorsement application).

## **Responsibilities of maintenance organisations and certifying staff.**

Please note that, as it already happens in many other cases of basic licence and type rating endorsement, this policy does not guarantee that when the rating is endorsed on the Part-66 licence the applicant is fully competent for the maintenance of a specific aircraft. That's why the requirement contained in 66.A.20(b)3 and the guidance contained in AMC 66.A.20(b)3 exist, placing the responsibility on the maintenance organization and the certifying staff to ensure that all those aspects not covered by the Part-66 licensing system are met before the person can certify maintenance (see AMC 66.A.20(b)3 for a list of examples).