

I'm currently a self-employed contract LAME with almost 7 years experience in General Aviation as a LAME. I have worked right across regional WA, Victoria, Tasmania and New South Wales. I am also a qualified pilot with a Commercial Pilots Licence and about 600hrs flight time. Prior to working in General Aviation I worked for 6 years as an Aircraft Technician in the RAAF. I gained my LAME's licence using CAR31 by completing the required CASA Basic Exams and submitting an SOE. There was no recognition of prior learning from CASA, as I had not attained the rank of Corporal, despite the fact that I held Trade Supervisory Authority as a Leading Aircraftsman. I will not dwell on this discrimination based on lack of rank as I believe there are more serious issues at stake with the Licencing of Aircraft Maintenance Personnel under CASR Part 66.

The CASR Part 66 regulation (that is in the process of replacing CAR31) is a confusing and poorly constructed regulation that is a bad fit for General Aviation (GA) Aircraft Maintenance Engineer Licencing. I and many of my colleagues agree that CAR31 licencing system was and is a good logical progressive licensing system. I will attempt to highlight what I see to be the major issues with CASR Part 66 .

Firstly, Part 66 creates a division between turbine powered aircraft and piston powered aircraft, this is unhelpful and unnecessary. The ability to safely certify for maintenance on an airframe system is irrespective of the type of engine fitted. An engineer licenced on Group 1 Airframes under CAR31 would be able to certify for airframe maintenance on all airframes turbine and piston powered. Now under Part 66, a newly licenced engineer with a B1.2 licence would only be able to certify for maintenance on the airframes of aircraft with piston engines and not airframes of aircraft with turbine engines. And the opposite is also true for a newly licenced engineer with only a B1.1 licence. This creates huge manning issues for workshops that maintain a mixed fleet of turbine and piston powered aircraft. This division is harmful for the industry and needs to be rectified. One solution would be to retain the CAR31 system of licencing indefinitely so as to enable personnel to continue to qualify for a Group 1 airframe licence and be issued both a B1.1 and B1.2 licence.

Secondly, Part 66 has no provision for the granting of instrument and radio licence privileges to the holder of a B1 licence for VFR aircraft. Five categories need to be certified for following the completion of an annual inspection or a 100hrly, namely Engine, Airframe, Electrical, Instrument and Radio. An aircraft engineer licenced under the Part 66 cannot sign for the Instrument or Radio categories of a VFR aircraft. For someone based in regional Australia this means that every time a service is conducted on any aircraft a B2 LAME needs to be flown out to carry out and certify for the Instrument and Radio category. This is expensive, unwarranted and discriminatory given that an engineer who qualified for a Group 1 Airframe licence under CAR31 could carry out this maintenance and certify for it. This issue needs to be resolved if GA is to survive long term in regional areas. Retaining the CAR31 system of licencing indefinitely, so as to enable personnel to continue to qualify for a Group 1 airframe licence and access the transitional Electrical, Instrument and Radio privileges is the best solution.

Thirdly, Part 66 has a requirement to have 6 months (550hrs Part 66 AMC) of full time work every 2 years to remain current. This is excessive and unwarranted. I would like to complete a degree at university, but I wouldn't be able to remain current for the duration of my course, even if I worked 1 day a week, which is not possible with a full time study load. By contrast a nurse is only required to complete 450hrs (~57days) every 5 years to be considered current. Why is the recency requirement

so high? Engineers are particularly disadvantaged in our industry compared to nursing. Female engineers who take an extended maternity break and then come back to work part time are severely disadvantaged. Are we trying to discourage women from becoming LAME's? This requirement is forcing some exceptionally gifted engineers to leave the industry, it needs to change. I am aware of training organisations that are cashing in on this requirement by offering a half day course and charging individuals \$1000. One of my friends did this course and said it only took a couple of hours and he has been out of the industry for 10 years. Training organisations are exploiting engineers due to the excessive recency requirements. Please seriously consider extending the recency requirements to be more in line with nursing. Trades such as electrician have no recency requirements and the level of attention to detail is just as critical as aircraft maintenance.

Part 66 licencing also brought with it a host of other issues of which you are probably aware of including, exorbitant fees from training organisations, lack of accessibility for people in regional areas, and an inability to tailor a licencing outcome that is specific to an individual's circumstances. For the survival of the General Aviation Industry, I recommend that CAR31 licencing via CASA Basic's and SOE be kept in place for the foreseeable future and the recency requirements for a holder of a Part 66 licence be extended or done away with. I believe the GA has a lot to offer private aviators, that organisations like RAAus cannot offer; including trained, competent and experienced aircraft maintenance personnel. If the regulations do not support GA, aviators will move over to a cheaper form of aviation and safety will suffer.