# Photo courtesy of South Pacific Avionics

## Maintenance Engineer Licence Limitations

You may feel you have the skills and knowledge to do so, but actually, you cannot perform an avionic repair or installation without the relevant licence categories and ratings.

Picture this: you're approached by an aircraft owner who wants to replace an aged transponder with a more capable Mode S model. It's a fairly straightforward job with technical data available from the manufacturer.

But are all your ducks in a row?

The answer depends on the licence categories and rating privileges you hold. You don't have the privilege to perform the maintenance if you hold only an aeroplane, rotorcraft, or powerplant rating – regardless of your electrical wiring and instrument plumbing prowess. To carry out and release to service the initial installation of the transponder, you need the relevant electrical, instrument, or radio licence categories and ratings. In addition, installations often require specialist test equipment and associated training.

This example also holds true for other avionic installations, such as audio panels, intercom systems, and encoders.

The crux of the matter is that non-

avionics rated Licensed Aircraft Maintenance Engineers (LAMEs) cannot certify a release-to-service for the installation of avionic equipment, unless it's specifically listed in Part 66 Appendix C – regardless of the technical data available.

#### **Rule Requirements**

Maintenance engineer privileges are detailed in Part 66 Appendix B *Group and Type Ratings* and Appendix C *Additional Privileges*. Advisory Circular AC43-14, *Avionics, Installations – Acceptable technical data* contains further information on licence privileges.

"If you're a mechanical LAME, please take the time to check that the task you are asked to carry out is within your privileges," says Bob Jelley, CAA Aviation Safety Adviser.

"Remember that in addition to Part 66 Appendix C, you need to comply with rule 43.53 *Performance of maintenance requirements.*"

### Part 145 Company Authorisations

To perform and certify maintenance using a Part 145 Company Authorisation, rule 145.60 *Authorisation procedures* details that to be issued an authorisation to release an aircraft to service, a person must hold either a LAME licence, equivalent qualification, or a CAA maintenance approval.

#### **Part 66 Review**

The CAA is reviewing the Part 66 licensing regime. That includes a review of the group and type ratings, system structure, along with additional privileges.

We expect to seek your further feedback on a draft revised rule in 2016.

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