



Summary of Public Submissions Received on NPRM 19-02 — Aircraft Maintenance Personnel Licensing

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General

Notice of Proposed Rule Making (NPRM) 19-02 was issued for public consultation on 15 February 2019, with a submission close-off of 29 March 2019. The purpose of NPRM 19-02 was to:

“Review and update those areas of Part 66 that no longer reflect modern aircraft technology and maintenance practices. This is particularly so in the areas of integrated aircraft avionics, maintenance practices, and improvements in aircraft reliability”.

A copy of the NPRM was sent to:

- The Ministry of Transport
- The Aviation Community Advisory Group (ACAG)
- The Aircraft Engineering Association of New Zealand
- The CAA Rules Drafting Group (RDG), that included three industry representatives

The NPRM was also published on the CAA website on 15 February 2019 and notified to the industry by automatic email alerts. Comments on the NPRM closed on 29 March 2019, with one extension granted till 5 April 2019.

Summary of Submissions

General

A total of 29 submissions were received out of 2,900 Part 66 AMEL holders. Of these, two submissions were from organisations, and the remainder were from individuals.

A general breakdown of submissions relating to acceptability of the NPRM proposals was:

Not acceptable under any circumstances:	4
Not acceptable but would be acceptable if changes were made:	13
Acceptable but would be improved if changes were made:	11
Acceptable without change:	1

Issues

Consultation Issues

A number of submissions were received expressing concern relating to the amount of consultation time allocated to comment on the NPRM, and the consultation process itself.

One submitter stated: “The amount of change within this NPRM demands a greater amount of consultation than just written submissions. Specifically, it is the context and rationale behind the changes which requires debate in open forums, such as road show meetings, where a wider representation can listen and provide constructive feedback. This is a Rule

crucial to aviation activities now and in the future. Our response is for CAA to be requested to change the consultation deadline and process and for the development of the AC to be defined.”

This submitter also stated that: “The Rules Development Group (RDG) Industry representatives were felt at a disadvantage as they were not always able to attend meetings which were scheduled at inconvenient times or at short notice and travel was involved. It was felt that the involvement of the industry representative was not as productive as it should have been. The process was extremely drawn out (18 months) considering the number of changes that have been suggested. ”

Another submitter stated: “I do not believe there has been sufficient industry engagement in this NPRM. Due to work loads and other factors people are not finding the time to properly review and submit on this NPRM.” This comment was supported by another submitter who stated: “I feel actual industry input is needed earlier in these processes so an actual balanced view point is achieved. Many of the points raised in the NPRM are influencing Avionics Engineers but all Avionics Engineers I talk to are disappointed in the actual wording of this document.”

Another submitter was concerned that the timing was unfair on GA: “I believe it is extremely unfair on GA to produce this document at this time of year with a close off in March. February and March are clearly the busiest time of the year for GA operators and maintenance providers who have very little spare time to analyse and comment on this NPRM and other ACs that have been released recently. The close off should be extended by at least one month to allow more time to comment.”

CAA Response

Public consultation leading up to these proposals started back in August 2014 with the issue of the consultation document “Part 66 Aircraft Maintenance Personnel Licensing-Improving Aircraft Maintenance Engineer Licensing”. As 66 submissions were received the CAA considers this represented good industry involvement. Also, based on this initial consultation there was a clear indication that a complete review of Part 66 was not called for – rather just a review of those rules identified as being in need of updating. In addition, three industry representatives were included in the Rules Drafting Group (RDG) that assisted in developing the NPRM, and AEANZ was granted an extension of time to make their submissions. Therefore, the CAA considered that any further extensive consultation was not called for and that the standard NPRM process would suffice.

The CAA notes the comment relating to the Rules Drafting Group process and will investigate ways to improve the process, particularly relating to industry involvement.

While acknowledging industry workloads, other than avoiding long public holiday breaks, it is difficult for the CAA to anticipate the best time to issue an NPRM. However there is provision for individuals to request an extension to the comment period but such requests must be made at the time the NPRM is issued.

Electric Powerplants

Three submitters commented that the NPRM made no mention of the new electric technology that is being developed and that Part 66 should include provision for future electric powerplants.

CAA Response

The CAA is aware of the advances in electric powerplant technology but the issue is outside the scope of this NPRM. However, the CAA will internally raise the issue of including electric powerplants in Part 66, and possibly other rule Parts, as a separate project.

Definition Of Maintenance

Two submissions were received from LAMEs that the Part 1 definition of “maintenance” should be revised. The rationale given was that the current definition could be open to interpretation and that where the term maintenance is used in Part 66 Appendix C, the rule has been stretched to include installation of intercom, audio controllers, and GPS systems under “additional privileges”.

CAA Response

The current CAR Part 1 Definition of “Maintenance” aligns with that of the definition in ICAO Doc 9760 Airworthiness Manual.

For comparison:

CAR Part 1- Definition

“Maintenance, in relation to an aircraft or aircraft component, means all work and inspections performed to ensure the continued airworthiness of the aircraft or aircraft component, and all modifications:”

ICAO Doc 9760 - Definition

“Maintenance. The performance of tasks required to ensure the continuing airworthiness of an aircraft, including any one or combination of overhaul, inspection, replacement, defect rectification, and the embodiment of a modification or a repair.”

This issue is outside the scope of this NPRM. However the CAA will internally raise the issue to assess if the definition should be reviewed.

Order Of Paragraph Letters In Rule 66.11

Two submitters questioned the order of paragraph letters (a, d, e, f) in rule 66.11 in the NPRM and sought confirmation that this was an error.

CAA Response

The CAA confirms that this is a formatting error and will be corrected in the final rule.

Key Stakeholder – Paragraph 2.5

A number of submitters were concerned that Part 145 Aircraft Maintenance Organisations (AMOs) were not included in the list of key stakeholders.

CAA Response

The CAA acknowledges that Part 145 AMOs were inadvertently left out of the list of key stakeholders. However, there were Part 145 representatives on the Rules Drafting Group. The CAA also notes that no submissions to this NPRM were received from any Part 145 AMOs as an organisational response.

New Terms

A number of submitters were concerned that some new terms were being introduced in this proposal that had not been defined in Part 1. Such terms included “radio systems”, “complex systems”, “competence” and “competency” .

CAA Response

The CAA acknowledges that a number of new terms are being introduced in this proposal. Not all terms are suitable for inclusion in Part 1 as their meanings can be different depending on what rule Part they are being applied to. If such terms are included in Part 1 then their meanings will apply equally over all rule Parts. It is the intention of the CAA to identify such terms and provide guidance on their Part 66 application and meaning through Advisory Circular/guidance material rather than defining them in Part 1. Such Advisory Circular/guidance material will be published on the CAA website as draft material and industry comment will be called for on this draft material.

The CAA will develop guidance material in AC66-1 to cover the meaning of the following terms in relation to aircraft maintenance - adjustment, competence/competency, complex, complex avionics systems, currency, LRU , radio systems.

Availability of Advisory Circulars

A number of submitters were concerned that Advisory Circulars (ACs) were not made available for comment along with the NPRM. Such concerns included that they were unable to comment on some proposed rules until they had the opportunity to comment on the AC, particularly where new terms were being introduced.

CAA Response

AC66-1 will be further developed post the final rule making process. This is done to avoid duplication of work and to ensure that the rule and the AC align. The CAA also needs to assess other ACs that may require amendment. Such AC/guidance material will be published on the CAA website as draft material and industry comment will be called for on this draft material.

Compensation of remote reading compass systems - Appendix C(a)(6)

A submitter expressed concern that compensation of remote reading compass systems is well beyond the level of understanding of an Airframe or Powerplant rated Engineer. The submitter was of the view that maintenance of remote reading compass systems be given to Avionics based Categories, and Airframe and Powerplant rated Engineers be limited to compensation of direct reading compasses only.

Another submitter considered the component changes in direct reading compass systems [Appendix C(a)(6)] to be confusing, and should be limited to where disassembly of the compass is not required. The submitter also suggested that the maintenance and installation of compass systems be included in Appendix C(c).

Another submitter commented that compass compensation for E, I. and R rated engineers has been overlooked. The current and new rule allows the rated airframe engineer to perform compass compensation and component change. Typically the Avionics Engineer has more training on this system but is expressly forbidden unless they have the appropriate rating.

Another submitter considered that remote reading compass systems should be defined, and Flux gate and AHRS (magnetometer) systems be excluded from the limited privileges. It was also suggested that Appendix C(a)(6) be removed as it is not included in Appendix C(c).

A further submitter made the following comment:

“Define remote reading compasses. Instrument rating exams define them as magnetic non-flux gate compasses with a mechanical remote link. Currently the reading is that a G1000 AHRS system qualifies to an Airframe/powerplant engineer as remote reading. Exclude Flux gate and AHRS (magnetometer) systems from the limited privileges.

Compass component changes. If a card or seal is replaced or even fluid is topped up this requires the compass being held in a vacuum chamber for a substantial time frame. So limit the maintenance to those with access to right maintenance equipment. Also make sure we are talking about non flux gate (AHRS) Magnetometer systems”.

CAA Response

This NPRM does not include any proposals to amend Appendix C(a)(6). However, the CAA acknowledges there is an anomaly in respect to Avionics Engineers but this is outside the scope of this NPRM, and the CAA will investigate it as a separate issue.

Post rule publication the CAA will conduct a review of all Part 66 syllabi and work with ASPEQ on examination questions if required.

Transitional and Savings Provisions – Rule 66.209 and rule 66.211

A number of submitters objected to Appendix A being revoked and wanted the transitional arrangements and Appendix A to remain, because they felt that they were losing the privileges allowed for under the transitional arrangements.

CAA Response

A transitional provision explains how the new rules will apply to circumstances that arose in the past. In the case of this proposal a period of time (12 months) is allowed from the

time the rule is signed by the Minister till the time the rules come into effect, to give those affected by the new rules time to prepare for the change.

Savings provisions have the effect of “saving” something that would otherwise be altered or abrogated by the new rules. In the case of this proposal all those who hold a group or type rating or licence issued under the Civil Aviation Regulations 1953 (Appendix A), will continue to have the rating or licence recognised after Appendix A is revoked.

The effect of applying transitional and savings provisions is known as “grandparenting”. For example if an individual currently holds an Aeroplane Group 4 Category/Rating they will continue to hold that privilege for the life of their Part 66 AMEL. But the CAA will no longer issue these privileges post the date of this rule coming into effect. Transition to Group 2 will not be automatically granted either; it will still require individuals to apply for this privilege, as per any additional privilege sought.

Also refer to paragraphs 3.3 and 3.4 in the NPRM preamble, pages 12 and 13 that explain this, and also the CAA Response under the heading Group 4 Issues.

Issue of Licences, Certificates and Ratings – Rule 66.9

A submitter took exception to rule 66.9(b)(6) relating to the ability to speak English. The submitter questioned what is the measure of “sufficient ability”, and including a requirement of sufficient ability to speak English could be used to discriminate against individuals who are unable to speak due to medical reasons.

CAA Response

The ability to understand, interpret and speak English is assessed as part of the oral Air Law examination (Subject 25). Assessment of any individuals who are unable to speak English due to medical reasons will be assessed on a case-by-case basis as required, and this may incur additional costs for the applicant.

The CAA notes that English is the internationally recognised language standard of aviation, as designated by ICAO.

Require LAMEs To Assure The CAA They Are Medically Able To Exercise Privileges – Rule 66.19 and Rule 66.9

A number of submissions raised serious concerns relating to the proposed reporting requirements for a change in medical conditions in rule 66.19(b). These concerns relate to defining - in the absence of any guidelines - what type of change in a medical condition a LAME is required to report, the reporting and assessing process, and the additional administration burden created. The view was also expressed that the current regulatory requirement in the Civil Aviation Act to satisfy the Fit and Proper Person (FPP) obligations is sufficient and that this proposal is disproportionate to the risk presented.

It was suggested that making the licence renewable every 5 years would be a better option.

It was also proposed that an initial medical requirement be implemented to provide a benchmark medical condition that should be monitoring hearing, eyesight and depression.

CAA Response

Because all individual aviation documents are lifetime documents, the CAA does not agree with the suggestion that the Part 66 AMEL should be renewed every five years.

Following feedback from submitters on this issue, the CAA has reconsidered the proposed medical condition reporting requirement in rule 66.19(b). We agree with the concerns raised by submitters. In addition, we feel that the workplace health and safety regime sufficiently addresses the risks and is a more appropriate regime in that employers and employees both have responsibilities under the Health and Safety at Work Act 2015 section 45.

The proposed medical condition reporting requirement will be removed from the final rule.

In the early project meetings, industry whole heartedly rejected having medical requirements for LAMEs stating that it would be another cost impost on industry. The CAA suggests that if the aircraft maintenance industry feels that a medical standard should be a future requirement for LAMEs, then CAA welcomes industry to raise this through the Issue Assessment Process by submitting a form CAA 24011/01 using the link: <https://www.caa.govt.nz/rules/about-rules>

Ensure Up-To-Date Experience and Training – Rules 66.57, 66.103, 66.207

Two submitters stated that rule 66.207(2) in its current form could not be met as 95% of IAs would not do 1000 hours of strictly Reviews of Airworthiness (RA) or Conformity over a two year period making this rule change impossible to comply with, unless it means that the IA must have done either 4 RAs or 4 conformities or a combination of both in a six month period over two years. If that being the case that would be in contradiction to rule 66.207(1).

Another 3 submitters made comments relating to the removal of the rating exam option in rule 66.103. Two submitters' view was this was contrary to aviation safety and wanted confirmation that the removal was not an error, and one submitter was uncertain as to the intent of the proposed amendment.

CAA Response

The CAA agrees that in its proposed form rule 66.207(2) would be difficult to meet. Rule 66.207(2) will be amended to read: “within the immediate preceding 2 years, the holder has for a period of at least 6 months met the recent experience requirements of rule 66.57.”

In light of the comments relating to the proposed changes to rule 66.103, the CAA will re-instate the option of “examinations acceptable to the Director” as a new paragraph (3) and renumber the proposed paragraph (3) as paragraph (4).

Raise Standards For Demonstrating Knowledge – Rule 66.53

There were 8 submissions relating to the proposal for applicants to complete a Knowledge Deficiency Report (KDR). None of the submissions supported the proposal for a variety of reasons including:

- Hard to carry out in practice as candidates exam question may not cover complete syllabus, so a person with 100% could still have deficiencies. Raising the pass mark to 75% would be a better option.

- The FAA, UKCAA, Transport Canada, and CASA do not use KDRs for LAMEs. Where is the data to show the benefit for NZ.
- The proposal would put a NZ LAME at a disadvantage to other countries where it is easier to get a licence.
- The proposal would be too time consuming and creates more bureaucracy.
- It is unreasonable to require a KDR for basic exams as exam questions are poorly written and not kept up to date. A KDR for rating exams and Air Law would be acceptable.
- The proposal would increase costs particularly for GA and small operators.

CAA Response

The purpose behind this proposal was for consistency and alignment with Part 61. The fact that other National Aviation Authorities (NAAs) may not have KDRs for Part 66 (or equivalent) is not seen as a reason for New Zealand to not introduce it. In addition, the purpose of the Part 66 AMEL and any issued type ratings is to enable the holder of this individual aviation document to exercise the privileges of this licence on New Zealand registered aircraft.

However, the strong objections to this proposal are recognised and this requirement will be removed from the final rule. Higher standards will be met through the proposed competency requirements in the proposed rule.

Group 4 Issues

Seven comments were received relating to Group 4 issues.

Two submitters objected to the removal of the Group 4 Type Rating on the grounds that it was a backward step, and will probably result in the industry being less skilled in the composite area as a result.

One submitter supported the revoking of the Group 4 aeroplane rating.

One submitter commented that by deleting Group 4 and incorporating it into Groups 1 and 2, the CAA was adding further diversity and complexity to these groups which was not the purpose of this proposal.

Two submitters holding Group 4 ratings were concerned that with Group 4 being revoked, the aeroplanes they currently certify would be placed in Group 2. As they do not hold a Group 2 rating they would no longer be able to certify these aeroplanes. They are seeking either a transitional arrangement where they could continue to certify these aeroplanes until they could obtain a Group 2 rating, or the granting of a Group 2 rating by grandfather rights.

One submitter noted that the current Group 1 and 2 aeroplane syllabus contains similar content on FRP (Group 4) constructions, and questions why are FRP all added to Group 2 when many are simple like Group 1 aircraft with fixed undercarriage.

CAA Response

The ratings of current Group 4 holders will continue to be valid for the lifetime of the holder (refer NPRM para 3.4). Transition to Group 2 will not be automatic – it will require experience. (See also the transitional and savings comments earlier in this document). The RDG discussed the removal of the aeroplane Group 4 rating at length and there was agreement that this was no longer needed—(refer NPRM paragraph 3.2.5). Discussion was also held around the fact that there isn't a group rating for composite rotorcraft and this has never caused any issues regarding experience with composites. It was also noted that the Original Equipment Manufacturers (OEMs) of composite aircraft have specific Instructions for Continuing Airworthiness (ICAs) for carrying out composite inspections and repairs to their aircraft and this also may require the use of specialist equipment and training.

Privileges and Limitations – Rule 66.205

A submitter made the following comment:

“Rule 66.205 does not limit an Airframe/Powerplant IA holder to conformity to their scope and are also allowed to inspect for conformity Avionics modifications.

The requirement of an Avionics IA being addressed in this NPRM indicated the Airplane/Power plant IA is not sufficient in this field, as these are complex systems.

It would improve the situation and keep in line with the reasons of changing Part 66 to exclude Avionics mod conformity if not having an E, I and R rating. Appendix B. B1 (e)(f) - Complex systems need a type-rating. This will get hard, a G1000 system is complex, whether fitted on a B300 or a C182. Is it being suggested that a Type-rating will be needed for avionics engineers working on a Cessna?"

CAA Response

This will be addressed in AC66-1: “that LAMEs responsible for embodying avionics modifications on aircraft engage a avionics IA early in the piece to ensure that the complexity issues are identified early” and/or “that IA holders who only have mechanical experience should carefully consider their knowledge and competency before agreeing to do conformity of any avionic modifications.”

Appendix C(d)(4)

Six submitters were concerned that while it is proposed to remove the limited privilege of installation of radio systems from category aeroplane and rotorcraft LAMEs, Appendix C(d)(4) permits a lighter than air LAME who has not received any additional avionics training to install radio systems. Appendix C(d)(4) needs to be amended to align with Appendix C(a)(4).

CAA Response

The CAA agrees and will amend Appendix C(d)(4) to align with Appendix C(a)(4).

Additional Privileges-Installation of Avionics Equipment-Rule Appendix C(a)(4)

Thirteen submitters made comment on the proposal to remove the additional privilege for Aeroplane, Rotorcraft, and Powerplant rated LAMEs to carry out the installation of avionics equipment. Of these submitters, 6 were against the proposal and 7 supported it.

Comments against the proposal included:

- Will cause unnecessary delays and expense to operators due to the difference in Avionics Engineers availability and charge-out rates.
- VHF radio and NAV is very simple these days with access to the latest installation manuals, instructions, photographs etc. No requirement for recurrency training and no requirement for avionics LAME to certify conformity.
- The desire to remove the privilege of installing avionics equipment from Aeroplane and Powerplant rated LAMEs appears confusing when LAMEs rated to lightweight aircraft are able to exercise avionics privileges on complex systems they may not be adequately trained for.
- Is there any documented evidence that a mechanical category aeroplane or rotorcraft type rated LAME has created a fundamental error in the installation of a VHF com? If the CAA has no evidence, what rationale is being used for this change.
- The change is in breach of section 9 of the Civil Aviation Act relating to a grant or renewal of an aviation document in respect to the engineer may not have the qualifications and experience applicable to the privilege.

Comments supporting the proposal included:

- With avionics technology rapidly changing, there is a risk that there are persons working on complex avionics systems without the required training or knowledge.
- Cases have been observed where installation has been to a very poor standard, even to the point where commercial strip connectors have been used in the wiring.
- Cases have been observed of mechanical IAs signing conformity on avionics major modifications while admitting to having no idea what they are looking at.

CAA Response

The proposed rules do not increase costs over those that already exist in the industry, relating to delays or availability of qualified engineers.

While some stand-alone VHF radio and NAV equipment is indeed simple, the problems arise when such units are integrated in complex avionics systems. This results in the engineer now dealing with systems rather than stand-alone units, and that requires a more advanced level of specialised experience. Also, avionics technology advances rapidly and

requires recurrent training to ensure engineers are current on the equipment they are working on. This will be particularly so with the introduction of new technology as part of the New Southern Sky programme.

The CAA acknowledges the anomaly in respect to LAMEs rated on lightweight aircraft and will correct this in the final rule. Refer to the CAA Response under the heading Appendix C(d)(4).

The CAA acknowledges that there is a lack of comprehensive evidence to identify areas where risks have eventuated to Part 66. There are a number of reasons for this:

- the lifetime validity of a Part 66 licence*
- many licence holders operating outside of certificated organisations, and thus receiving limited regulatory oversight or engagement*
- limited mechanisms to identify and quantify the contribution of maintenance personnel to aviation safety.*

However, the CAA has received sufficient anecdotal evidence (including submissions made to this NPRM) to identify a risk that some installations of avionics equipment may be sub-standard. The CAA considers that this justifies the proportionate proposals in this NPRM.

The CAA does not agree that the proposal breaches section 9 of the Civil Aviation Act, as the proposed changes to Part 66 provide sufficient safeguards to require that LAMEs are competent to carry out the work required.

Terminology - Rule 66.205(d)

Two submitters considered that this paragraph reads as a note rather than a specific regulatory requirement. They suggest moving it to a note or deleting it.

CAA Response

This is commonly used rule drafting. It clarifies a specific limitation or restriction and needs to be included in the rule to have legal effect.

Rule 66.57 Numbering Scheme

A submitter questioned the numbering scheme in rule 66.57 as it does not follow the number scheme of the overall document.

CAA Response

The numbering scheme is in accordance with modern drafting practice where a rule consists of only one paragraph.

Re-Calculate Weight and Balance – Appendix C(c)(6)

A submitter expressed concern that an Avionics only rated LAME would not have the training, thorough knowledge, and experience of weight and balance procedure or calculations. There is no logical rationale for this new limited privilege to be added without recognised training.

CAA Response

Appendix C(c)(6) only allows for recalculation not a reweigh. The CAA also notes that weight and balance is covered in AC66-2.4 Examination Subject 4 Aeroplanes 1, which is a compulsory subject for the Electrical, Instrument and Radio licence categories.

Replacement of Line Replaceable Units-Appendix C(a)(5)

Two submitters considered that there needs to be a definition of a Line Replaceable Unit (LRU) in Part 1, otherwise replacement of a LRU could be treated as swapping any box with a serial number and could be subject to abuse.

CAA Response

The comment is noted and the CAA will include the meaning and use of a LRU in guidance material in ACs being developed.

Electrical, Instrument, and Radio Category Theory Exams

A submitter made the following proposal:

“I propose making the E(13), I(14) and R(15) theory exams a compulsory requirement for gaining Group 1 ratings in the Electrical, Instrument or Radio category the same way that Aeroplanes I(4), Rotorcraft(6), Piston engines(7) or Turbine engines(8) theory exams are required to gain ratings in their respective categories.

Then if the candidate wants to carry on and gain further E, I or R ratings they then need to do Avionics 2 exam, in line with Aeroplanes 2 theory exams.

This would then align the Avionics and Mechanical pathways to holding of categories. As the current exams sit I don't believe the Avionics 1 exam is to the knowledge level to allow the awarding of an E, I or R category of rating.”

CAA Response

We note the considered points raised in this submission, however this is not within the scope of this project and would need wider consultation with industry. The CAA suggests that if the submitter feels that the E, I, and R theory exams should be a compulsory requirement for gaining Group 1 ratings, the submitter could raise this through the Issue Assessment Process by submitting a form CAA 24011/01 using the link: <https://www.caa.govt.nz/rules/about-rules> .

END