

## **Annex IV**

### **Acceptable Means of Compliance to Part-147**

#### **SECTION A**

##### **AMC 147.A.100(i) Facility requirements**

1. For approved basic maintenance training courses this means holding and ensuring reasonable access to copies of all Parts and national aviation legislation, examples of typical aircraft maintenance manuals and service bulletins, airworthiness directives, aircraft and component records, release documentation, procedures manuals and aircraft maintenance programmes.
2. Except for the Parts and national aviation regulations, the remainder of the documentation should represent typical examples for both large and small aircraft and cover both aeroplanes and helicopters as appropriate. Avionic documentation should cover a representative range of available equipment. All documentation should be reviewed and updated on a regular basis.

##### **AMC 147.A.105 Personnel requirements**

1. The larger maintenance training organisation (an organisation with the capacity to provide training for 50 students or more) should appoint a training manager with the responsibility of managing the training organisation on a day to day basis. Such person could also be the accountable manager. In addition, the organisation should appoint a quality manager with the responsibility of managing the quality system as specified in paragraph 147.A.130(b) and an examination manager with the responsibility of managing the relevant Part147 Subpart C or Subpart D examination system. Such person(s) may also be an instructor and/or examiner.
2. The smaller maintenance training organisation (an organisation with the capacity to provide training for less than 50 students) may combine any or all of the sub-paragraph (1) positions subject to the competent authority verifying and being satisfied that all functions can be properly carried out in combination.
3. When the organisation is also approved against other Parts which contain some similar functions then such functions may be combined.

##### **AMC 147.A.105(b)and (g) Personnel requirements**

With the exception of the accountable manager, an EASA Form 4 should be completed for each person nominated to hold a position required by 147.A.105(b). An example of an EASA Form 4 is included in Appendix 2.

##### **AMC 147.A.105(f) Personnel requirements**

Any person currently accepted by the competent authority in accordance with national aviation regulations in force prior to Part 147 coming into force may continue to be accepted in accordance with 147.A.35(f)

##### **AMC 147.A.105(h) Personnel requirements**

Updating training should normally be of 35 hours duration but may be adjusted to the scope of training of the organisation and particular instructor/examiner.

##### **AMC 147.A.115(c) Instructional equipment**

1. An appropriate selection of aircraft parts means appropriate in relation to the particular subject module or sub-module of Part-66 being instructed. For

example the turbine engine module should require the provision of sufficient parts from different types of turbine engine to show what such parts look like, what the critical areas are from a maintenance viewpoint and to enable disassembly/assembly exercises to be completed.

2. Appropriate aircraft, engines, aircraft parts and avionic equipment means appropriate in relation to the particular subject module or sub-module of Part-66 being instructed. For example category B2 avionic training should require amongst other equipment, access to at least one type of installed autopilot and flight director system such that maintenance and system functioning can be observed and therefore more fully understood by the student in the working environment.

3. “Access” may be interpreted to mean, in conjunction with the facilities requirement of 147.A.100(d), that there may be an agreement with a maintenance organisation approved under Part 145 to access such parts, etc.

**AMC 147.A.120(a) Maintenance training material**

Training course notes, diagrams and any other instructional material should be accurate. Where an amendment service is not provided a written warning to this effect should be given.

**AMC 147.A.130(b) Training procedures and quality system**

1. The independent audit procedure should ensure that all aspects of Part-147 compliance should be checked at least once in every 12 months and may be carried out as one complete single exercise or subdivided over a 12-month period in accordance with a scheduled plan.

2. In a small maintenance training organisation the independent audit function may be contracted to another maintenance training organisation approved under Part-147 or a competent person acceptable to the competent authority. Where the small training organisation chooses to contract the audit function it is conditional on the audit being carried out twice in every 12 month period with one such audit being unannounced.

3. Where the maintenance training organisation is also approved to another Part requiring a quality system, then such quality systems may be combined.

4. When training or examination is carried out under the sub-contract control system:

(i) a pre audit procedure should be established whereby the Part 147 approved maintenance training organisation’ should audit a prospective sub-contractor to determine whether the services of the sub-contractor meet the intent of Part 147.

(ii) a renewal audit of the subcontractor should be performed at least once every 12 months to ensure continuous compliance with the Part-147 standard.

(iii) the sub-contract control procedure should record audits of the sub-contractor and to have a corrective action follow-up plan.

5. The independence of the audit system should be established by always ensuring that audits are carried out by personnel not responsible for the function or procedure being checked.

**AMC 147.A.135 Examinations**

1. Examinations may be computer or hard copy based or a combination of both.
2. The actual questions to be used in a particular examination should be determined by the examination staff.

**AMC 147.A.140 Maintenance training organisation exposition**

1. A recommended format of the exposition is included in Appendix 1.
2. When the maintenance training organisation is approved in accordance with any other Part which also requires an exposition, the exposition required by the other Part may form the basis of the maintenance training organisation exposition in a combined document., as long as the other exposition contains the information required by 147.A.140 and a cross reference index is included based upon Appendix I.
3. When training or examination is carried out under the sub-contract control system the maintenance training organisation exposition should contain a specific procedure on the control of sub-contractors as per Appendix 1 item 2.18 plus a list of sub-contractors as required by 147.A.140 (a)12 and detailed in Appendix I item 1.7.
4. The competent authority may approve a delegated exposition approval system for all changes other than those affecting the approval.

**AMC Part 147.A.145(d) Privileges of the maintenance training organisation**

1. When training or examination is carried out under the sub-contract control system it means that for the duration of such training or examination, the Part-147 approval has been temporarily extended to include the sub-contractor. It therefore follows that those parts of the sub-contractor's facilities, personnel and procedures involved with the Part-147 approved maintenance training organisation's students should meet requirements of Part-147 for the duration of that training or examination and it remains the Part-147 organisation's responsibility to ensure such requirements are satisfied.
2. The maintenance training organisation approved under Part-147 is not required to have complete facilities and personnel for training that it needs to sub-contract but it should have its own expertise to determine that the sub-contractor meets the Part-147 standards. Particular attention should be given to ensuring that the training that is delivered also meets the requirements of Part 66 and the aircraft technologies as appropriate.
3. The contract between the maintenance training organisation approved under Part-147 and the sub-contractor should contain:
  - a provision for the Agency and the competent authority to have right of access to the sub-contractor;
  - a provision for the sub-contractor to inform the Part-147 approved maintenance training organisation of any change that may affect its Part-147 approval, before any such change takes place.

**AMC 147.A.200 The approved basic training course**

For the purpose of this paragraph, a training hour means 60' training, without pauses.

**AMC 147.A.200(b) The approved basic training course**

Each licence category or subcategory basic training course may be subdivided into modules or sub-modules of knowledge and may be intermixed with the practical training elements subject to the required time elements of 147.A.200 (f) to (k) inclusive being satisfied.

**AMC 147.A.200(d) The approved basic training course**

1. Where the maintenance training organisation approved under Part-147 contracts the practical training element either totally or in part to another organisation in accordance with –147.A.100(d), the organisation in question should ensure that the practical training elements are properly carried out.
2. At least 30% of the practical training element should be carried in an actual maintenance working environment.

**AMC 147.A.200(g) The approved basic training course**

Typical conversion durations are given below:

- (a) The approved basic training course to qualify for conversion from holding a Part-66 aircraft maintenance licence in subcategory A1 to subcategory B1.1 or B2 should not be less than 1600 hours and for conversion from holding a Part-66 aircraft maintenance licence in subcategory A1 to subcategory B1.1 combined with B2 should not be less than 2200 hours. The course should include between 60% and 70% knowledge training.
- (b) The approved basic training course to qualify for conversion from holding a Part-66 aircraft maintenance licence in subcategory B1.1 to B2 or category B2 to B1.1 should not be less than 600 hours, and should include between 80% and 85% knowledge training.
- (c) The approved basic training course to qualify for conversion from holding a Part-66 aircraft maintenance licence in subcategory B1.2 to subcategory B1.1 should not be less than 400 hours, and should include between 50% and 60% knowledge training.
- (d) The approved basic training course to qualify for conversion from holding a Part-66 aircraft maintenance licence in one subcategory A to another subcategory A should not be less than 70 hours, and should include between 30% and 40% knowledge training.

**AMC 147.A.205 Basic knowledge examinations**

The competent authority may accept that the maintenance training organisation approved under Part-147 can conduct examination of students who did not attend an approved basic course at the organisation in question.

**AMC 147.A.210(a) Basic practical assessment**

Where the maintenance training organisation approved under **Part-147** contracts the practical training element either totally or in part to another organisation in accordance with 147.A.100(d) and chooses to nominate practical assessors from the other organisation, the organisation in question should ensure that the basic practical assessments are carried out.

**AMC 147.A.210(b) Basic practical assessment**

An assessed pass for each student should be granted when the practical assessor is satisfied that the student meets the criteria of 147.A.200(e). This means that the student has demonstrated the capability to use relevant tools/equipment/test equipment as specified by the tool/equipment/test equipment manufacturer and the use of maintenance manuals in that the student can carry out the required inspection/testing without missing any defects, can readily identify the location of components and is capable of correct removal/fitment/adjustment of such components. The student is only required to carry out enough inspection/testing and component removal/fitment/adjustments to prove capability. The student should also show an appreciation of the need to ensure clean working conditions and the observance of safety precautions for the student and the product. In addition, the student should demonstrate a responsible attitude in respect to flight safety and airworthiness of the aircraft.

**AMC 147.A.300 Aircraft type/task training**

1. Aircraft type training may be sub-divided in airframe type training, powerplant type training, or avionic systems type training. A maintenance training organisation approved under Part-147 may be approved to conduct airframe type training only, powerplant type training only or avionics systems type training.
2. Airframe type training means type training including all relevant aircraft structure and systems excluding the powerplant.
3. Powerplant type training means type training on the bare engine, including the build-up to a quick engine change unit.
4. The interface of the engine/airframe systems should be addressed by either airframe or powerplant type training.
5. Avionic systems type training means type training on avionics systems covered by but not necessarily limited to ATA (Air Transport Association) chapters 22, 23, 25, 27, 31, 33, 34, 45, 46, 73 and 77 or equivalent.

## **SECTION B PROCEDURE FOR COMPETENT AUTHORITIES**

### **AMC 147.B.10 (a) Competent authority - General**

1. In deciding upon the required organisational structure, the competent authority should review the number of certificates to be issued, the number and size of potential Part-147 approved maintenance training organisations within that Member State, as well as the level of civil aviation activity, number and complexity of aircraft and the size of the Member State's aviation industry.
2. The competent authority should retain effective control of important surveillance functions and not delegate them in such a way that Part-147 organisations, in effect, regulate themselves in airworthiness matters.
3. The set-up of the organisational structure should ensure that the various tasks and obligations of the competent authority are not relying on individuals. That means that a continuing and undisturbed fulfilment of these tasks and obligations of the competent authority should also be guaranteed in case of illness, accident or leave of individual employees.

### **AMC 147.B.10 (b) Competent authority – Qualification and training**

1. competent authority surveyors should have:
  - 1.1 practical experience and expertise in the application of aviation safety standards and safe operating practices;
  - 1.2 comprehensive knowledge of:
    - a. relevant parts of implementing rules, certification specifications and guidance material;
    - b. the competent authority's procedures;
    - c. the rights and obligations of a surveyor;
    - d. quality systems;
    - e. continuing airworthiness management.
  - 1.3 training on auditing techniques.
  - 1.4 five years relevant work experience to be allowed to work as a surveyor independently. This may include experience gained during training to obtain the 1.5 qualification.
  - 1.5 a relevant engineering degree or an aircraft maintenance or training qualification with additional education. 'relevant engineering degree' means an engineering degree from aeronautical, mechanical, electrical, electronic, avionic or other studies relevant to the maintenance and continuing airworthiness of aircraft/aircraft components.
  - 1.6 knowledge of a relevant sample of aircraft types

- 1.7 knowledge of maintenance training standards.
2. In addition to technical competency, surveyors should have a high degree of integrity, be impartial in carrying out their tasks, be tactful, and have a good understanding of human nature.
3. A programme for continuation training should be developed that ensures that the surveyors remain competent to perform their allocated tasks.

#### **AMC 147.B.10 (c) Competent authority - Procedures**

The documented procedures should contain the following information:

- (a) The Member State's designation of the competent authority(ies).
- (b) The title(s) and name(s) of the manager(s) of the competent authority and their duties and responsibilities.
- (c) Organisation chart(s) showing associated chains of responsibility of the senior persons.
- (d) A procedure defining the qualifications for staff together with a list of staff authorised to sign certificates.
- (e) A general description of the facilities.
- (f) Procedures specifying how the competent authority(ies) ensure(s) compliance with Part-147.

#### **AMC 147.B.20 Record-keeping**

1. The record-keeping system should ensure that all records are accessible whenever needed within a reasonable time. These records should be organized in a consistent way through out the competent authority (chronological, alphabetical order, etc.).
2. All records containing sensitive data regarding applicants or organisations should be stored in a secure manner with controlled access to ensure confidentiality of this kind of data.
3. All computer hardware used to ensure data backup should be stored in a different location from that containing the working data in an environment that ensures they remain in good condition. When hardware- or software-changes take place special care should be taken that all necessary data continues to be accessible at least through the full period specified in 147.B.20.

#### **AMC 147.B.110(a) Approval procedure**

- 1 The audit should be conducted on the basis of checking the facility for compliance, interviewing personnel and sampling any relevant training course for its conduct and standard.

- 2 The audit report should be made on an EASA Form 22 (see appendix III).

**AMC 147.B.110(b) Approval procedure**

The date each finding was rectified should be recorded together with the reference document.

**AMC 147.B.130(b) Findings**

1. In the case of a level 2 finding, the competent authority may give up to 6 months notice of the need for rectification. Dependent upon the seriousness of the level 2 finding(s) the competent authority may choose a notice period less than 6 months.
2. When the competent authority chooses to allow 6 months, the initial notification should be of 3 months duration to the quality manager followed by the final 3 months notice to the accountable manager.



## **APPENDIX I**

### **Maintenance training organisation exposition (MTOE)**

1. The following subject headings form the basis of the MTOE required by JAR–147.65.
2. Whilst this format is recommended it is not mandatory to assemble the MTOE in this manner as long as a cross reference index is included in the MTOE as an appendix and the Part 1 items remain in Part 1.
3. Part 2, 3 and 4 material may be produced as separate detailed manuals subject to the main exposition containing the part 2, 3 and 4 fundamental principles and policy on each item. It is then permitted to delegate the approval of these separate manuals to the senior person but this fact and the procedure should be specified in paragraph 1.10.
4. Where an organisation is approved in accordance with any other Part(s) which require an exposition it is acceptable to combine the exposition requirements by merging the Part 1 items and adding the parts 2, 3 and 4. When this method is used it is essential to include the cross reference index of Part 4 item 4.3.

#### **PART 1 – MANAGEMENT**

- 1.1. Corporate commitment by accountable manager
- 1.2. Management personnel
- 1.3. Duties and responsibilities of management personnel, instructors, knowledge examiners and practical assessor
- 1.4. Management personnel organisation chart
- 1.5. List of instructional and examination staff  
Note: A separate document may be referenced
- 1.6. List of approved addresses
- 1.7. List of sub-contractors as per 147.A.145(d)
- 1.8. General description of facilities at paragraph 1.6 addresses
- 1.9. Specific list of courses approved by the competent authority
- 1.10. Notification procedures regarding changes to organisation
- 1.11. Exposition and associated manuals amendment procedure

#### **PART 2 – TRAINING AND EXAMINATION PROCEDURES**

- 2.1. Organisation of courses
- 2.2. Preparation of course material
- 2.3. Preparation of classrooms and equipment
- 2.4. Preparation of workshops/maintenance facilities and equipment
- 2.5. Conduct of basic knowledge & practical training

- 2.6. Records of training carried out
- 2.7. Storage of training records
- 2.8. Training at locations not listed in paragraph 1.6
- 2.9. Organisation of examinations
- 2.10. Security and preparation of examination material
- 2.11. Preparation of examination rooms
- 2.12. Conduct of examinations
- 2.13. Conduct of basic practical assessments
- 2.14. Marking and record of examinations
- 2.15. Storage of examination records
- 2.16. Examinations at locations not listed in paragraph 1.6
- 2.17. Preparation, control & issue of basic training course certificates
- 2.18. Control of sub-contractors

### PART 3 – TRAINING SYSTEM QUALITY PROCEDURES

- 3.1. Audit of training
- 3.2. Audit of examinations
- 3.3. Analysis of examination results
- 3.4. Audit and analysis remedial action
- 3.5. Accountable manager annual review
- 3.6. Qualifying the instructors
- 3.7. Qualifying the examiners
- 3.8. Records of qualified instructors & examiners

### PART 4 – APPENDICES

- 4.1. Example of documents and forms used
- 4.2. Syllabus of each training course
- 4.3. Cross reference Index - if applicable

**APPENDIX II**

**EASA Form 4**

**[COMPETENT AUTHORITY]**

Details of Management Personnel required to be accepted as specified in Part-.....

1. Name:
2. Position:
3. Qualifications relevant to the item (2) position:
4. Work experience relevant to the item (2) position:

Signature: .....

Date: .....

On completion, please send this form under confidential cover to the competent authority.

Competent authority use only

Name and signature of authorised competent authority staff member accepting this person:

Signature: ..... Date: .....

Name: ..... Office: .....

## APPENDIX III

# EASA Form 22

6)

## 7) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22

8)

## Part 1: General

Name of organisation:

Approval reference:

Requested approval rating/  
Form 11 dated\*:

Other approvals held (If app.)

Address of facility audited:

Audit period: from \_\_\_\_\_ to \_\_\_\_\_ :

Date(s) of audit(s):

Audit reference(s):

Persons interviewed:

Competent authority surveyor:

Signature(s):

Competent authority office:

Date of Form 22 part 1 completion:

\*delete where applicable

## 9) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22

### Part 2: Part-147 Compliance Audit Review

The five columns may be labelled & used as necessary to record the approved training/examinations, facility, including subcontractor's, reviewed. Against each column used of the following Part-147 subparagraphs please either tick (✓) the box if satisfied with compliance or cross (X) the box if not satisfied with compliance and specify the reference of the Part 4 finding next to the box or enter N/A where an item is not applicable, or N/R when applicable but not reviewed.

Para	Subject					
147.A.1 00	Facility requirements	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 05	Personnel requirements	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 10	Records	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 15	Instructional equipment	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 20	Maintenance training material	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 25	Records	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 30	Training procedures and quality system	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 35	Examinations	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>
147.A.1 45	Privileges	<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>

147.A.1 50	Changes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.2 00	Approved basic training course	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.2 05	Basic knowledge examinations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.2 10	Basic practical assessment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.2 10	Aircraft type/task training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
147.A.3 05	Examinations and assessments	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Competent authority surveyor (s):

Signature(s):

Competent authority office:

Date of Form 22 part 2 completion:

10)

**11) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**

12)

**PART 3: Compliance with Part-147 maintenance training organisation exposition (MTOE)**

Please either tick (✓) the box if satisfied with compliance; or if not satisfied with compliance and specify the reference of the Part 4 finding; or enter N/A where an item is not applicable; or N/R when applicable but not reviewed.

Part 1

**MANAGEMENT**

- |      |                          |  |
|------|--------------------------|--|
| 1.1  | <input type="checkbox"/> | Corporate commitment by accountable Manager  |
| 1.2  | <input type="checkbox"/> | Management personnel   |
| 1.3  | <input type="checkbox"/> | Duties and responsibilities of management personnel, instructors, knowledge examiners and practical assessor |
| 1.4  | <input type="checkbox"/> | Management personnel organisation chart  |
| 1.5  | <input type="checkbox"/> | List of instructional and examination staff  |
| 1.6  | <input type="checkbox"/> | List of approved addresses   |
| 1.7  | <input type="checkbox"/> | List of sub-contractors as per 147.A.145(d)  |
| 1.8  | <input type="checkbox"/> | General description of facilities of paragraph 1.6 addresses   |
| 1.9  | <input type="checkbox"/> | Specific list of courses approved by the competent authority   |
| 1.10 | <input type="checkbox"/> | Notification procedures regarding changes to organisation  |
| 1.11 | <input type="checkbox"/> | Exposition and associated manuals amendment procedures   |

Part 2

**TRAINING AND EXAMINATION PROCEDURES**

- |     |                          |   |
|-----|--------------------------|---|
| 2.1 | <input type="checkbox"/> | Organisation of courses                                       |
| 2.2 | <input type="checkbox"/> | Preparation of course material                                |
| 2.3 | <input type="checkbox"/> | Preparation of classrooms and equipment                       |
| 2.4 | <input type="checkbox"/> | Preparation of workshops/maintenance facilities and equipment |
| 2.5 | <input type="checkbox"/> | Conduct of basic knowledge & practical training               |
| 2.6 | <input type="checkbox"/> | Records of training carried out                               |
| 2.7 | <input type="checkbox"/> | Storage of training records                                   |
| 2.8 | <input type="checkbox"/> | Training at locations not listed in paragraph 1.6             |
| 2.9 | <input type="checkbox"/> | Organisation of examinations                                  |

**13) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**

**PART 3: Compliance with Part-147 maintenance training organisation exposition (MTOE)**

- |      |  |   |
|------|--|---|
| 2.10 |  | Security and preparation of examination material                    |
| 2.11 |  | Preparation of examination rooms                                    |
| 2.12 |  | Conduct of examinations   |
| 2.13 |  | Conduct of basic practical assessments                              |
| 2.14 |  | Marking and record of examinations                                  |
| 2.15 |  | Storage of examination records                                      |
| 2.16 |  | Examinations at locations not listed in paragraph 1.6               |
| 2.17 |  | Preparation, control & issue of basic training course certificates. |
| 2.18 |  | Control of sub-contractors.   |

Part 3      **TRAINING SYSTEM QUALITY PROCEDURES**

- |     |  |   |
|-----|--|---|
| 3.1 |  | Audit of training                             |
| 3.2 |  | Audit of examinations                         |
| 3.3 |  | Analysis of examination results.              |
| 3.4 |  | Audit and analysis remedial action            |
| 3.5 |  | Accountable manager annual review             |
| 3.6 |  | Qualifying the instructors                    |
| 3.7 |  | Qualifying the examiners                      |
| 3.8 |  | Records of qualified instructors & examiners. |

Part 4      **APPENDICES**

- |     |  |  |
|-----|--|--|
| 4.1 |  | Example of documents and forms used.   |
| 4.2 |  | Syllabus of each training course.      |
| 4.3 |  | Cross reference Index - if applicable. |

Date of Form 22 part 3 completion:

MTOE reference:

MTOE amendment:

Competent authority audit staff:

Signature(s):

Competent authority office:

Date of Form 22 part 3 completion:

**14) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**



**Part 4: Findings regarding Part-147 compliance status**

Each level 1 and 2 finding should be recorded whether it has been rectified or not and should be identified by a simple cross reference to the Part 2 requirement. All non-rectified findings should be copied in writing to the organisation for the necessary corrective action.

Part 2 or 3 ref.	Audit reference(s):  Findings	L e v e l	Corrective action		
			Date Due	Date Closed	
					Reference

**15) PART-147 APPROVAL RECOMMENDATION REPORT EASA FORM 22**

**Part 5: M.A. Subpart F approval or continued approval or change recommendation**

Name of organisation:

Approval reference:

Audit reference(s):

Applicable Part-147 amendment status:

The following Part-147 scope of approval is recommended for this organisation:

Or, it is recommended that the Part-147 scope of approval specified in EASA Form 11 referenced ..... be continued.

Name of recommending competent authority surveyor:

Signature of recommending competent authority surveyor:

Competent authority office:

Date of recommendation:

Form 22 review (quality check) :

Date:

**APPENDIX IV**

**EASA Form 12**

<b>EASA FORM 12</b> <b>Page 1 of 2</b>	<b>APPLICATION FOR PART-147</b> <b>INITIAL / CHANGE OF APPROVAL</b>
<p>Registered Name &amp; Address of Applicant:</p> <p>Trading Name (if different):</p> <p>Addresses Requiring Approval:</p> <p>Tel No:.....Fax No:.....E Mail:.....</p>	
<p>Scope of Part-147 Approval Relevant to This Initial */ Change of * Application ( See other side for training course designators to be used):</p> <p>Basic Training:</p> <p>Type Training:</p> <p>Does the organisation hold approval under Part-21 * / Part-145 * / Part-M *</p> <p>* Cross out whichever is not applicable</p>	
<p>Name &amp; Position of Accountable Manager:</p> <p>Signature of Accountable Manager:</p> <p>Date of Application:</p> <p>Please send this form with any required fee to be paid under National Legislation to your National Aviation Authority</p>	<p>This space for official use</p>

## **Annex VII**

### **Guidance Material to Part-147**

#### **SECTION A**

##### **GM to 147.A.10 General**

Such an organisation may conduct business from more than one address and may hold more than one Part approval.

##### **GM to 147.A.100(i) Facility requirements**

Where the organisation has an existing library of regulations, manuals and documentation required by another Part it is not necessary to duplicate such a facility subject to student access being under controlled supervision.

##### **GM to 147.A.105 (c) Personnel requirements**

The maintenance training organisation should have a nucleus of permanently employed staff to undertake the minimum amount of maintenance training proposed but may contract, on a part-time basis, instructors for subjects which are only taught on an occasional basis.

##### **GM to 147.A.105 (f) Personnel requirements**

It is recommended that potential instructors be trained in instructional techniques.

##### **GM to 147.A.105(g) Personnel requirements**

Examiners should demonstrate a clear understanding of the examination standard required by Part-66 and have a responsible attitude to the conduct of examinations such that the highest integrity is ensured.

##### **GM to 147.A.105(h) Personnel requirements**

1. Records should show for each instructor/examiner when the updating training was scheduled and when it took place.
2. The updating training may be subdivided during the 24 months into more than one element and may include such activities as attendance at relevant lectures and symposiums.

##### **GM to 147.A.110 Records of instructors, examiners and assessors**

Instructors, knowledge examiners and practical assessors should be provided with a copy of their terms of reference.

##### **GM to 147.A.115(a) Instructional equipment**

1. Synthetic training devices are working models of a particular system or component and include computer simulations.
2. A synthetic training device is considered beneficial for complex systems and fault diagnostic purposes.

##### **GM to 147.A.130 (b) Training procedures and quality system**

1. The primary objective of the quality system is to enable the training organisation to satisfy itself that it can deliver properly trained students and that the organisation remains in compliance with Part 147.
2. The independent audit is a process of routine sample checks of all aspects of the training organisation's ability to carry out all training and examinations to

the required standards. It represents an overview of the complete training system and does not replace the need for instructors to ensure that they carry out training to the required standard.

3. A report should be raised each time an audit is carried out describing what was checked and any resulting findings. The report should be sent to the affected department(s) for rectification action giving target rectification dates. Possible rectification dates may be discussed with the affected department(s) before the quality department confirms such dates on the report. The affected department(s) should rectify any findings and inform the quality department of such rectification.

4. A large training organisation (an organisation with the capacity to provide training for 50 students or more) should have a dedicated quality audit group whose sole function is to conduct audits, raise finding reports and follow up to ensure that findings are being rectified. For the small training organisation (an organisation with the capacity to provide training for less than 50 students) it is acceptable to use competent personnel from one section/department not responsible for the function or procedure to check the section/department that is responsible subject to the overall planning and implementation being under the control of the quality manager.

5. The management control and follow up system should not be contracted to outside persons. The principal function is to ensure that all findings resulting from the independent audit are corrected in a timely manner and to enable the accountable manager to remain properly informed of the state of compliance. Apart from rectification of findings the accountable manager should hold routine meetings to check progress on rectification except that in the large training organisation such meetings may be delegated on a day to day basis to the quality manager as long as the accountable manager meets at least once per year with the senior staff involved to review the overall performance.

#### **GM to 147.A.135 Examinations**

The competent authority will determine when or if the disqualified examiner may be reinstated.

#### **GM to 147.A.145 (d) Privileges of the maintenance training organisation**

1. The pre audit procedure should focus on establishing compliance with the training and examination standards set out in Parts 147 66.

2. The fundamental reason for allowing a maintenance training organisation approved under Part-147 to sub-contract certain basic theoretical training courses is to permit the approval of maintenance training organisations which may not have the capacity to conduct training courses on all Part-66modules.

3. The reason for allowing the subcontracting of training modules 1 to 6 and 8 to 10 only is, most of the related subjects can generally also be taught by training organisations not specialised in aircraft maintenance and the practical training element as specified in 147.A.200 does not apply to them. On the contrary training modules 7 and 11 to 17 are specific to aircraft maintenance and include the practical training element as specified in 147.A.200. The intent of the “limited subcontracting” option as specified in 147.A.145 is to grant Part-147 approvals only to those organisations having themselves at least the capacity to teach on aircraft maintenance specific matters.

## **SECTION B PROCEDURE FOR COMPETENT AUTHORITIES**

### **GM to 147.B.100 (a) General**

Variation of the Part-147 approval means either the need to amend the schedule of approved training courses or the need to approve or accept 147.A.150 changes.

### **GM to 147.B.110 Approval procedure**

1. A meeting should be arranged between the applicant and the Member State who issue Part-147 approvals to determine if the applicant's training activities justify the investigation for issue of Part-147 approval and to ensure that the applicant understands what needs to be done for Part-147 approval. This meeting is not intended to establish compliance but rather to see if the activity is a Part-147 activity.
2. Assuming that the applicant's activities come within the scope of Part-147 approval, instructions should be sent to the competent authority staff requesting that an audit of the applicant be carried out and when satisfied that compliance has been established, a recommendation for the issue of approval should be submitted to the competent authority staff who grant approval unless these are the same staff. The competent authority should determine how and by whom the audit shall be conducted. For example, if the applicant is a large training organisation, it will be necessary to determine whether one large team audit or a short series of small team audits or a long series of single person audits is most appropriate for the particular situation. A further consideration in the case of a combined Part-145/147 organisation is the possibility to combine the audits.
3. It is not necessary to sample all basic and type training courses that will be approved, but it is necessary to sample, as appropriate, one basic and one type training course for as long as is necessary to establish that training is conducted in an appropriate manner, except that the minimum sampling time for the course being sampled should not be less than 3 hours. Where no training course is being conducted during the audit, arrangements should be made to return at a later date to sample the conduct of a training course.
4. Where it is intended that the maintenance training organisation may conduct training and examinations away from the maintenance training organisation address(es) in accordance with 147.A.145(c), then a sample audit should be carried out by the competent authority from time to time of the process to ensure that procedures are followed. For practical reasons such sample audits will need to be carried out when training is being conducted away from the maintenance training organisation address(es).
5. It is not necessary to sample all examinations associated with a training course, but it is necessary to sample, as appropriate, one basic and one type training course examination
6. The auditing surveyor should ensure that they are always accompanied throughout the audit by a senior member of the organisation making application for Part-147 approval. Normally this should be the proposed quality manager. The reason for being accompanied is to ensure that the organisation is fully aware of any findings during the audit. In any case, the proposed quality manager/senior member of the organisation must be debriefed at the end of the audit visit on the findings made during the audit.

7. There will be occasions when the auditing surveyor may find situations in the applicant's organisation on which he/she is unsure about compliance. In this case, the organisation must be informed about possible non-compliance at the time of audit and the fact that the situation will be reviewed before a decision is made. The organisation must be informed of the decision within 2 weeks of the audit visit in writing if the decision is a confirmation of non-compliance. If the decision is a finding of being in compliance, a verbal confirmation to the organisation will suffice.

**GM to 147.B.115 Variation procedure**

1. A change of name of the maintenance training organisation requires the organisation to submit a new application as a matter of urgency stating that only the name of the organisation has changed including a copy of the organisation exposition with the new name. On receipt of the application and the organisation exposition, the competent authority should reissue the approval certificate valid only up to the current expiry date.

2. A name change alone does not require the competent authority to audit the organisation, unless there is evidence that other aspects of the maintenance training organisation have changed

3. A change of accountable manager requires the maintenance training organisation to submit such fact to the competent authority as a matter of urgency together with the amendment to the Accountable Manager exposition statement.

4. A change of any of the senior personnel specified in 147.A.105(b) or the examination staff in 147.A.105 (e) requires the maintenance training organisation to submit a Form 4 in respect of the particular person to the competent authority. If satisfied that the qualifications and experience meet the standard required by Part-147, the competent authority should indicate acceptance in writing to the maintenance training organisation.

5. A change in the maintenance training organisation's exposition requires the competent authority to establish that the procedures specified in the exposition are in compliance with the intent of Part-147 and then to establish if these are the same procedures intended for use within the training facility.

6. Any change of location of the maintenance training organisation requires the organisation to make a new application to the competent authority together with the submission of an amended exposition. The competent authority will follow the procedure specified in 147.B.110 (a) and (b) in so far as the change affects such procedure before issuing a new Part-147 approval certificate valid for a new recommended 2 year period or with a new issue date for continuous approvals.

7. The complete or partial re-organisation of a training organisation will require the re-audit of those elements that have changed.

8. Any additional basic or aircraft type training courses requires the maintenance training organisation to make a new application to the competent authority together with the submission of an amended exposition. For basic training extensions, an additional sample of new examination questions relevant to the modules associated with the extension being sought will be required to be submitted. The competent authority will follow the procedure of paragraph 2 in so far as the change affects such procedures unless the competent authority is satisfied that the maintenance training organisation has a well-controlled procedure to qualify such change when it is not necessary to conduct the audit elements of the paragraph 2 procedure.