

Alternative Means of Compliance

Number:

CAA-NL reference:

Date:

AltMoC scope: **AMC 66.A.20(b)2 Privileges (L3H, L3G, L4H)**

1 Background

CAA-NL finds the criteria to maintain Certifying Staff certification privileges as described in “AMC 66.A.20(b)(2)” disproportionate for holders of a license with subcategories L3H, L3G and L4H, for the maintenance of hot air balloons, gas balloons and hot air airships. This is in contradiction with the Basic Regulation, which states in paragraph (6) that regulations should be proportionate for sport and recreational aviation.

AMC 66.A.20(b)(2) provides an alleviation in certain circumstances where instead of 100 days, 50 days of maintenance experience are required in 2 years (25 days per year), spread over the years, in order to maintain the certification privileges.

Balloons do not operate from airfields of clubs and are instead generally dispersed throughout the EASA territory. The only scheduled maintenance task for a balloon is the annual or 100 hour inspection; other maintenance is performed when required. For a balloon, the typical annual inspection takes 0.5-1.0 working days including documentation and airworthiness survey. Most Part 66 L-licensed engineers are active on a very part time basis. Their workload is limited by the number of balloons in their geographical area and also their own availability to work as an engineer in their spare or leisure time. Whilst a few very active balloon engineers undertake over 20 inspections in a year, the vast majority undertake fewer than 10. Such engineers have no prospect of coming close the AMC 66.A.20(b)(2) requirement of 25 days per year, yet their work is critical to the continuing airworthiness of the majority of balloons. The normal arrangement is for engineers to work under the authority of a CAO (or CAMO), therefore with a degree of supervision.

Therefore, the CAA-NL has issued this alternative means of compliance (AltMoC) so that Certifying Staff can keep exercising their privileges, while still guaranteeing the current safety level.

2 Alternative Means of Compliance to AMC 66.A.20(b)(2)

- (a) This AltMoC to AMC 66.A.20(b)(2) applies only to Certifying Staff under following conditions:
- (1) Only for licences in subcategory L3H, L3G, L4H;
 - (2) Only for engineers working under the authority of a CAO or CAMO (excludes engineers operating as Independent Certifying Staff)
 - (3) Only for balloons and airships as listed in Appendix I to AMC to Part 66.
- (b) The 6 months of maintenance experience in the preceding two years, should be understood as having performed in the past 2 years at least 4 yearly or 100hrs inspections in accordance with the Aircraft Maintenance Programme in accordance with ML.A.302 or the Minimum Inspection Programme per AMC1 ML.A.302(d).
- (c) For the purpose of this AltMoC, "performing" an inspection shall constitute the issuance of a release to service by the Certifying Staff in accordance with ML.A.801 after either performing the work by the Certifying Staff itself or after having the work performed under supervision of the Certifying Staff in accordance with ML.A.801(d).
- (d) In case fewer than 4 yearly / 100hrs inspections can be performed per section (b) above, each missing inspection shall be replaced by 5 maintenance tasks which are not eligible to be performed as pilot-owner maintenance (see Appendix II to Part ML). For these maintenance tasks, acting as a supervisor for these tasks in accordance with ML.A.801(d) is considered equal to actually performing the task.
- (e) To avoid a too long period without experience, the experience should be spread over the 2-year period.
- (f) For engineers holding more than one rating amongst L3H, L3G and L4H, at least one annual / 100 hour inspection should be included on each rated type in every two year period.
- (g) The experience should be documented in an individual log book or in any other recording system (which may be an automated one) containing the following data:
- Date;
 - Aircraft type;
 - Aircraft identification i.e. registration;
 - Operation performed e.g. 100 hour / annual check,
 - Type of activity i.e. perform, supervise, release;
 - Subcategory used (L1, L1C, L2, L2C);
 - Duration in days or partial-days.
- (h) In order to be allowed to reinstate the privileges after the privileges were lost, the Certifying Staff must perform maintenance tasks under supervision, until sufficient experience has been gathered to be again in compliance with the requirement stated in this AltMoC. During this period, the Certifying Staff will not be allowed to exercise its privileges on the applicable aircraft types