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Subject: FlyerTech Ltd Response to Notice of Proposed Amendment (NPA) No 2007-04 Re-issuance of the Part-66 Aircraft Maintenance Licence

FlyerTech Limited were the first truly independent EASA Part M Sub Part G Company in Europe. Currently we have over ten EASA Part 66 Licensed Engineering Staff acting in a Continuing Airworthiness Management Department completing numerous tasks in association with continued airworthiness management functions, aircraft audits and British Civil Aviation Requirements Section A8-8 and B8-8 E3 Reporting Requirements. As an independent Part M Sub Part G Company NPA No 2007-04 has some serious consequences to our business, our staff and more importantly over the aviation industry in the UK.

EASA Part 66 Licensed engineers holding privileges within a maintenance environment are responsible for the safe release of an aircraft. However, by way of contrast a licensed engineer within continued airworthiness management has to plan and ensure that the continued airworthiness of a fleet of aircraft is maintained. Therefore, applying only a 20% weighting for Part 66 Licence Holders hoping to retain their privileges in the Continued Airworthiness Management field is very inappropriate.

Should the revalidation of the Part 66 require 6 months practical experience this would penalise experienced Part 66 licensed engineers with privileges employed at FlyerTech Ltd as there is no possibility of the level of experience on live aircraft completing live maintenance tasks. For the business to complete the tasks for which they are utilised requires a level of competence that only experience that comes from attaining a Part 66 licence and type knowledge with several years experience both on the shop floor and in an aircraft continued airworthiness department. For the aviation industry as a whole it is difficult to recruit the correct level of expertise into the continued airworthiness field and by removing what has been an individual's qualification that shows his competence on an aircraft type. It will have a two fold effect. Firstly, it could turn Part 66 Licence Holder's away from a field in the industry that requires the level of commitment only a Part 66 Licence Holder can fulfil. In the future this is going to become even more important with the onset of Airworthiness Review Certificates EASA Part M Sub Part I. Secondly; it will undoubtedly have a demotivational effect on the Part 66 Staff throughout the industry in Europe who in a number of cases aspire to move into the Continued Airworthiness Management. Therefore, as a result there may be less experienced personnel employed in the Continued Airworthiness management field.

However, having laid down the concerns in this regards, FlyerTech Ltd would like to offer a solution to ensure that EASA Part 66 licence privileges are maintained for the Certifying aircraft staff and that Aircraft technical Services staff are not penalised for a Licence for which they have worked hard to both attain and keep. It is FlyerTech's belief that Technical Services Staff be awarded a separate category of licence to ensure that the Part 66 licence has its own privileges for personnel working in the Continued Airworthiness Management. It is our belief that the Part 66 licence should have a Non type Rated C Category as a minimum to ensure that the correct level of experience is maintained in the field. Otherwise it is our experience that there could be a downturn in the continued airworthiness, safety and planning standards across Europe.

Yours faithfully,

Martin Bell
Operations Director on behalf of FlyerTech Ltd.