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QCM quality control management AG



Continuation training



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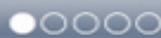
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Editorial

Dear Readers,



Welcome to our December edition.

First of all I would like to wish you and your families a happy New Year! I hope you all survived the holidays without too much trouble and you were able to relax a bit with family and friends. I certainly could.

Now we are all back at work and we are excited to see where 2013 will take us. Will it be better than 2012? What challenges lie ahead of us? I am sure we will be able to master them together.

QCM has again enhanced its training portfolio partly with the help of Lufthansa Technical Training. We are looking forward to this new joint venture.

This month Georg Stöcker posed several questions to EASA and shares with you the results in the **main article**.

Also included are a couple of **short topics**.

In the not so distant future there are our courses, of course. Please have a look at the **open course status** and our course updates.

This month we have no **job offers** but you can of course continue to send us your job offers.

I wish you a successfull 2013!

Tina Cameron
Q.C.M

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Various Questions to EASA

During the last months I had several discussions with competent authorities regarding the interpretation of Part-66 requirements.

To receive a type rating entry in the Part-66 aircraft maintenance licence today, according to the latest revision of Part-66 implemented with Commission Regulation (EU) No 1149/2011 of 21 October 2011, the following is required:

1. theoretical type training and
2. practical type training and
3. on the job training (OJT), but only if it is the first type of aircraft in a category or subcategory.

With respect to the practical training and the OJT I had various discussions with competent authorities how to interpret the requirements of Part-66 and the associated AMC & GM material.

To verify whose interpretation of this material is the most applicable one, I raised various enquiries with EASA.

Below you find my enquiries and the answers from EASA (printed with permission of EASA Rulemaking Directorate):

Enquiry #1311

Aircraft Maintenance Licenses (Part-66)

Subject: Type training theoretical element and practical element

Part-66 Appendix III uses the terminologies "examination" and "assessment". Is this differentiation by purpose and if yes what is the meaning of these two terms? (see Appendix III point 1 and point 4).

My personal interpretation is that the term "examination" means the "test" after a theoretical training and the term "assessment" means the "testing" after practical training. Is this correct?

Statement EASA:

"Examination" is a written form of demonstration of a certain level of theoretical knowledge by the student based on achievement of the learning objectives, usually performed on completion of a theoretical training course or a portion of a course. The student shall demonstrate, to the levels identified in the Appendix III syllabus, the detailed theoretical knowledge of the aircraft's applicable systems, structure, operations, maintenance, repair, and troubleshooting according to approved maintenance data, as well as the use of manuals and approved procedures, including the knowledge of relevant inspections and limitations. The standard, format, pass mark, etc. are defined in Appendix III, 4.1.. The examination shall be performed by the appropriately trained and approved examiner.

"Assessment" is a practical form of measuring the competence of the student by evaluating three major factors associated to the learning objectives: knowledge, skills and attitude, usually performed on completion of a practical training course. The assessment should focus on the competencies relevant to the aircraft type and its maintenance. The principles on how to perform the competence assessments are given in AMC Appendix III. The assessment shall be performed by appropriately trained and approved assessors.



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In Appendix III point 5 the title is "Type examination standard". What does this term mean now? Does this term include the previous terms "examination" and "assessment"? Reading through this point for me it is not absolutely clear whether it is applicable for the theoretical part only or also for the practical part.

In addition in point 5(h)3 it says "... The examiner(s) shall not have been involved in the applicant's training."

In AMC to Part-66 Appendix III "Evaluation of the competence assessment and assessors" point 3 says "... The roles may be combined for - the assessor and the instructor for the practical elements ... (depending on the size of the organisation) ..."

Statement EASA:

Regarding the Appendix III section 5., this Section 5 "Type Examination Standard" does not apply to the examination performed as part of type training. This Section only applies to those cases where type examination is performed as a substitute for type training, which means it is intended for the examinations conducted by (or on behalf of) the competent authority on those aircrafts that do not require type training (typically Group 2 and Group 3 aircrafts). So, it is true that the examiners authorised by the competent authority shall not have been involved in the applicant's training.

In all other cases AMC to Part-66 Appendix III applies, which means that the roles of the assessor and the instructor may be combined for the practical elements, depending on the size of the organisation.

What do these terms "examiner" and "assessor" mean?

Once again my personal interpretation is that "examiner" is the person who performs the theoretical "test" and "assessor" is the person who performs the practical "test".

If my interpretation is correct what is the situation if the Part-66 version used in a Member State uses the same terminology for these different terms? This results in the fact that there does not exist a difference for these two different subjects/functions (examination/assessment and examiner/assessor). Is this the intention of the rule and the AMC? I can't believe.

Regarding your question about the roles of examiners and assessors, ... these are different functions (which do not prevent that one person can't be authorised both as examiner and assessor). ... your simple definition that "examiner" is the person who performs the theoretical "test" and "assessor" is the person who performs the practical "test" (is agreed also). Normally, these functions should not be confused. The expression "The examination shall be oral, written or practical assessment based, or a combination thereof, ..." applies only for Section 5 "Type Examination Standard".



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Enquiry #1324

Aircraft Maintenance Licenses (Part-66)

In Section 6 of Appendix III to Part-66 it states:

"... The final assessment of the completed OJT is mandatory and shall be performed by a designated assessor appropriately qualified. ..."

Point 8 of AMC to Section 6 of Appendix III to Part-66 states:

"... The function of the assessor, as described in Section 6 of Appendix III to Part-66, is to conduct the final assessment of the completed OJT. This assessment should include confirmation of the completion of the required diversity and quantity of OJT and should be based on the supervisor(s) reports and feedback. ..."

... Further guidance about the assessment and the designated assessors is provided in Appendix III to AMC to Part-66. ..."

Question:

What is the intention of the requirement regarding the assessment after OJT?

1. Is the evaluation of the completed OJT syllabus/records sufficient together with a briefing held between the assessor and the supervisor?
2. Is it necessary to test the trainee on the aircraft based on the performed tasks, similar to the assessment after the practical training?

Statement EASA:

The answer to the first question is YES, and to the second question the answer is NO. Indeed, there is a difference between the practical training assessment and OJT assessment.

On next page a table for better understanding.

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	COMPETENCE ASSESSOR	OJT ASSESSOR
What/who is assessed:	Students following practical element of training Reference: Appendix III, 4.2.; AMC Appendix III	Completeness of the OJT. Reference: Appendix III, 6.; AMC to Section 6 of Appendix III
Function of assessor:	To perform the final evaluation of the knowledge, skills and attitude of the trainee following the practical element of training. Reference: Appendix III 4.2.; AMC Appendix III	To conduct the final assessment of the completed OJT, whereas the students competence is indirectly justified. Reference: Appendix III, 6.; AMC to Section 6 of Appendix III 8.
Organisation :	Part-147 Reference: Appendix III 1(b)	Part-145 or M.A. Subpart F with A rating Reference: Appendix III 6.; AMC to Section 6 of Appendix III 1.
Objectives:	To evaluate if the student has gained the required competence in performing safe maintenance, inspections and routine work according to the maintenance manual and other relevant instructions and tasks as appropriate for the type of aircraft. Reference: Appendix III, 3.2.	To confirm the completion of the required diversity and quantity of OJT, based on the supervisor(s) reports and feedback. It is sufficient that the completion of individual OJT tasks is confirmed by the direct supervisor(s), without being necessary the direct evaluation of the assessor. Reference: AMC to Section 6 of Appendix III 7. & 8.
Type of assessment:	The assessment may be: <ul style="list-style-type: none"> • diagnostic (prior to a course), • formative, • summative (partial or final evaluation), • performed task-by-task, • performed as a group of tasks, performed as a final assessment Reference: AMC to Part-66 Appendix III 2)	The assessment may be: summative, as a final evaluation of the completeness of the OJT Reference: AMC to Section 6 of Appendix III to Part-66
Qualification:	The assessment shall be performed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process being undertaken and be authorised to do so by the organisation. Guidance about the qualification is given in AMC to Part-66 Appendix III 3. Reference: Appendix III 4.2.; AMC to Part-66 Appendix III 3.)	The OJT shall be assessed by designated assessors appropriately qualified. It means that the assessors should demonstrate training and experience on the assessment process being undertaken and be authorised to do so by the organisation. Guidance about the qualification is given in AMC to Part-66 Appendix III 3. Reference: Appendix III 6.; AMC to Part-66 Appendix III 3.)
Procedure included in:	Part-147 MTOE Reference: Appendix III 1(b); Part-147	Part-145 Exposition Manual (chapter 3.15) Reference: AMC 145.A.70 (a)

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So far interpretation of the Part-66 requirements regarding "Practical Training" and "On the Job Training (OJT)".

Hopefully this will be implemented in a uniform manner within the "EASA Member States" to ensure appropriate competition within the Member States.

Besides these Part-66 items I raised another question with respect to the bilateral agreements between the EU and Canada on the one side and the EU and USA on the other side.

Enquiry #1310:

Working Arrangements:

ED Decision 2004/02/CF has been repealed with ED Decision 2012/002/C which refers now to the Bilateral Agreement signed between EU and Canada and entered into force on 26 July 2011.

Question:

What is the status of ED Decision 2004/04/CF which has been amended by ED Decision 2007/001/C. Are these ED Decisions still valid even the Bilateral Agreement signed between EU and USA entered into force on 01 May 2011?

Statement EASA:

The Agreement between the European Union and the United States supersedes the Decisions ED 2004/04/CF, and ED 2007/001, as far as the EU Member States are concerned.

The Decisions have not been formally repealed because they still apply to non-EU EASA associated States (Switzerland, Iceland, Norway), which are not covered by the EU-US BASA.

Hope this information is of helpful use for all of you, as it is for me for my future work.

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Safe attitudes make all the difference

When employees have a safe attitude, they have a genuine concern for their own safety and well-being as well as that of co-workers. They feel it is their responsibility to help maintain a safe work environment for all. Good for them, and good for you. "Safety

is our number 1 priority," say a lot of companies. But when the chips are down and production needs to be increased, safety may suddenly become **number 2**.



Having a good safety attitude means that both the company and employees have to make safety a core value. Values don't change every time priorities do. Values become part of the way you and your workers operate every day on the job. They are part of your organization's:

- Core
- Culture
- Policies
- Actions

Time and again, award-winning health and safety programs prove to be those in which the employer places a high priority on worker safety, and employees readily participate in activities that advance safety objectives. In other words, everyone from the CEO to the newest, lowest level employee takes safety seriously and always makes it priority number 1.

What It Takes

What does it take to develop good safety attitudes among employees?

- **Encourage employees** to think about safety 24/7, not only when they're at work.
- **Talk about safety all the time.** It has to be something people are always discussing, thinking about, and improving.
- **Make sure employees work safely.** This job falls largely to your supervisors, who have to have good safety attitudes, too.
- And you and your staff have to be checking up, monitoring performance, and being visible.
- **Encourage employee** participation, suggestions, questions, and even complaints about unsafe conditions.
- **Set an example for your workers.** If they see you and your safety staff wearing PPE, following rules, eliminating hazards, and investigating incidents, they'll follow your lead take safety seriously, too.
- **Provide positive feedback** for safe performance and attitudes. People love to be recognized and praised for doing the right thing.
- **Correct reported safety hazards right away.** Nothing says that you and management also have a good safety attitude more than demonstrating that you care and are looking out for your workers.





Prescription Drugs and Sleep Aids May Hurt Sleep

Some prescription medicines, as well as some prescription and over-the counter sleep aids, can cause problems with sleep. The fix may be to adjust the type or dose of medication or seek sleep behaviour therapy.

Prescription sleep aids and other prescription medications can interfere with much-needed sleep, reports the December 2012 Harvard Health Letter. Sleep is essential to good health, and a lack of it can lead to heart disease, high blood pressure, stroke, weight gain, and diabetes. Yet one in five Americans struggle with insomnia every night, according to the National Sleep Foundation. "Prescription drugs can be a serious problem," says sleep expert Dr Lawrence Epstein, an instructor in medicine at Harvard Medical School. Some prescription sleep aids, when taken for long periods of time, become less effective and actually interfere with sleep.

Other types of prescription medications may also interfere with sleep. Some contain stimulants that make it difficult to fall asleep. Others like steroids, antidepressants, and some medicines for migraine, heart disease, and allergies can wake you with nausea, night sweats, or needing to go to the bathroom.



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Notice of Proposed Amendments (NPAs)

TITLE	DATE PUBLISHED	END OF COMMENT
NPA 2012-24 Certification Specifications, Acceptable Means of Compliance and Guidance Material for Tethered Gas Balloons ("CS-31TGB") Turbine Engine CSs in	2012-12-06	2013-03-06
NPA 2012-23 Turbine Engine CSs in Icing Conditions - Advisory Material	2012-12-06	2013-03-06
NPA 2012-22 Large Aeroplane Certification Specifications in Supercooled Large Drop, Mixed phase, and Ice Crystal Icing Conditions - Advisory Material	2012-11-29	2013-03-01
NPA 2012-21 Volcanic ash ingestion in turbine engines	2012-11-28	2013-02-28
NPA 2012-20 Amendment of the AMC for pilot medical certification (LAPL)	2012-11-28	2013-01-02
NPA 2012-19 Approval requirements for Air-Ground Data Link and ADS-B in support of Interoperability requirements	2012-11-21	2013-01-14
NPA 2012-18 Licensing and medical certification of air traffic controllers	2012-11-22	2013-04-01
NPA 2012-17 Part-M General Aviation Task Force (Phase 1)	2012-10-29	2013-01-29
NPA 2012-16 Systematic review and transposition of existing FAA TSO standards for parts and appliances into EASA	2012-10-11	2013-01-11



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Please find below our open courses with seats available.

Train the Trainer

This year we offer Train the Trainer courses. You can either participate in our full course or visit the course in two sessions. The two sessions will address Module 1 and Module 2 at two dates while the full course addresses both Modules in one session. Both versions amount to a total duration of 5 days.

The course dates are as follows:

Two sessions: 09.-11. April (Module 1) and 29.-30. May 2013 (Module 2)

One session: 15.-19. July 2013 (both Modules)

Airbus A320/A330/A340 Interfamily General Familiarization

We are organising a 3-day course here at our location in Belp in co-operation with Lufthansa Technical Training. The date will most likely be 08.-10. April 2013. Please contact us directly for more information and registration.

If you are interested in participating in these or any other training please do not hesitate to contact us.

Course title	Date	Seats	Instructor
EASA Part-145 Refresher	20.01.13	open	Dave Paterson
EASA Part-21 DOA Basic	29. - 31.01.13	open	Christian Schusser
OTAR Part-39	04. - 05.02.13	open	Paul Baumann
Structure Repair Manual	04. - 05.02.13	open	TBD
Structur Repair Manual Training Boing	06. - 07.02.13	open	TBD
Safety & Quality Management Systems	11. - 14.02.13	open	Markus Friedli
EASA Part-145	18. - 20.02.13	open	Georg Stöcker
Maintenance Program	25. - 26.02.13	open	TBD
Internal Auditor	04. - 06.03.13	open	Markus Friedli
EASA Part-M Subpart G	11. - 13.03.13	open	Paul Baumann

Open Course Status EASA Part-147 Type Trainings

Course title	Date	Seats available	Instructor
Learjet 35/36 B1/T1	04.-18.03.2013	Open	Walter Brisch

If not stated otherwise, courses take place in our facilities in Belp/Berne.
Please click on the Course title for detailed information

Course update



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Currently there are no vacancies.

Take advantage of our Newsletter platform if you wish to publish a job advertisement or if you are looking for a new challenge in the aviation industry.

Important:

Please note that details of job advertisements or searches for the next edition must reach our office (info@qcm.ch) by the **22nd of each month**.

Without further notice, you advert will be published only once.



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We hope that you have found this month's continuation report informative. Do not hesitate to contact us for further information.

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