ELGD

Section C

Section D

Section E

Section F

Section G

Section H

Section I

Section J

2007

SECTION B

CONVERSION OF PROTECTED RIGHTS

- B1 Transfer of Protected Rights to a Part-66 Licence
- B2 BCAR to Part-66 Conversion Dates
- B3 Recommendation for Applicants Converting to a Part-66 Licence
- B4 Fast-Track Process for Part-66 Conversions
- B5 Qualifications Giving Protected Rights
- B6 Conversion of BCAR LWTR to Part-66 Basic Licence
- B7 Authorisation Conversion Criteria
- B8 Conversion of LWTR's of Section L Issue 14 Onwards
- B9 National Privileges on Conversion
- B10 Issue of a Category A Licence to a previously Unlicensed Engineer
- B11 Conversion of BCAR Type Ratings to a Part-66 Licence
- B12 Protected Rights to Category C
- B13 Limitations on a Converted Licence
- B14 Removing Limitations from a Basic Licence
- B15 Converting to a Non-Restricted (Without Limitations) Basic Category Licence
- B16 Removing Limitations from a Type Rating
- B17 Making Your Application
- B18 If Your Application Fails
- Appendix A Common Part-66 Conversion Scenarios
- Appendix B Removal of Limitations from a Part-66 Licence
- Appendix C Exemption from Experience Requirement
- Appendix D Diagram of Fast-Track Process

Section K

B1 TRANSFER OF PROTECTED RIGHTS TO A PART-66 LICENCE

B1.1 Background to JAR-66

JAR-66 introduced requirements that were generally at a higher or broader level than those that existed previously under UK National licensing. However to ensure that certifying staff retained their entitlement to certify provision was made for protected rights to be transferred to a JAR-66 licence. JAR-66 covered aircraft above 5700 kg MTOM only.

Under JAR-66 protected rights applied only to aeroplanes and helicopters of 5700 kg MTOM and above and so only these privileges could be transferred to a JAR-66 licence. For privileges held but not yet included within JAR-66, the Section L BCAR licence was re-issued reflecting these privileges.

B1.2 Part-66

Under Part-66 the provisions of transferring protected rights are largely the same as for JAR-66, except that Part-66 includes both aircraft above and below 5700 kg.

The conversion of certification privileges regarding electrical power generation and distribution systems has changed between JAR-66 and Part-66.

Previously on conversion to a JAR-66 AML, a B2 licence holder has been granted limitation 8 to the basic licence and qualifying aircraft types reflecting protected rights for certification privileges in electrical power generation and distribution in mechanical systems.

It has been determined that protected rights regarding certification privileges in electrical power generation and distribution systems is more appropriately achieved by the issue of a Part-66 B1 and B2 AML with limitations applied to both categories of licence, reflecting an individuals licence scope and certification privileges prior to conversion.

Current JAR-66 licence holders with limitation 8 applied to the basic licence and qualifying aircraft types may continue to exercise certification privileges in electrical power generation and distribution systems. At the individuals next licensing event a Part-66 AML will be issued as described in the previous paragraph replacing the existing JAR-66 AML.

BCAR Section L type rated licence holders may have certification privileges conferred to them under Airworthiness Notice 3 in electrical power generation and distribution systems and avionic LRU replacement and bite check.

Provision has been made for these certification privileges to be recognised under protected rights on conversion to be Part-66 AML. Protected Rights conferred under the auspices of AWN 3 do not extend to aircraft above 5700 kg MTOM. Further information regarding this can be found in Section B4.

Where a Part-66 licence is referred to throughout this Section, it also applies to those applicants holding a JAR-66 licence.

B2 BCAR TO PART-66 CONVERSION DATES

As of 28 September 2006 BCAR licences are no longer issued, unless specifically requested for the certification of aircraft listed in Annex II of EC Regulation 1592/2002. A Part-66 licence will be issued instead, with the appropriate limitations.

As of 28 September 2008 a Part-66 licence will be required for the certification of all aircraft regulated by EASA, therefore, any BCAR Section L licence used for aircraft other than Annex II (mentioned above) will be converted to a Part-66 licence on application.

Note 1: BCAR applicants who have not completed the qualifications for licence issue, must qualify for Part-66 licence issue by completion of the requisite Part-66 exam modules. However, BCAR module 13 (Human Performance) will exempt applicants in Part-66 module 9 (Human Factors) and post issue 15 BCAR module 7 (Fixed and Variable Pitch Propellers) will exempt applicants in Part-66 module 17 (Propeller). No other modules have been assessed as equivalent. All other modules must be taken to the Part-66 exam standards.

Note 2: For BCAR applicants currently awaiting oral boards or completing an approved course (see B2.1 also), the current BCAR rules will continue. However, should the applicant fail an oral board, the provisions of BCAR Section L 5.2.1 will apply.

B2.1 BCAR Limitation 101 (BCAR Approved Courses)

Part-66 does not provide for the above limitation, which previously under BCAR Section L was endorsed on the licence of those applicants who completed an approved course of training. This limitation required a further 12 months aircraft maintenance experience before any authorisation to sign a certificate of release to service could be issued.

BCAR applicants, issued with a Part-66 licence in accordance with Section B2, will still require this experience prior to the endorsement of a first type rating. It is acceptable however, to undertake the type training and testing within this 12 month period and

Section C

Section D

Section E

Section F

Ċ

Section

Section H

Section

Section J

2

Section

make application in readiness for the end of the 12 month period.

B3 RECOMMENDATION FOR APPLICANTS CONVERTING TO A PART-66 LICENCE

It is recommended by the CAA that applicants wishing to convert their basic BCAR-Section L licence and authorisations/type ratings to a Part-66 AML, apply to convert current approvals/type ratings only.

Correctly issued approvals from a Part-145 organisation within an EU or full Member State of the JAA are considered protected rights on conversion, however, determination of these protected rights from previous employment is often considerably more exhaustive and subsequently more time consuming to achieve.

The CAA recognises that individual's protected rights for these aircraft type additions will remain (where valid) and this can be achieved at any subsequent future time when required by the individual.

Full recognition of an individual's protected rights can be achieved on conversion, but it is likely that this will take significantly longer than converting current authorisations and the rejection rate for these applications is traditionally high.

B4 FAST-TRACK PROCESS FOR PART-66 CONVERSIONS

The Personnel Licensing Department (PLD) of the CAA have launched new application forms, details of which can be found in Section A17.

With the introduction of Part-66 PLD now offer two methods of licence conversion to licensed engineers, dependant upon the requirements of the licence holder and organisation that they are working for. The two methods, available now, are described below.

B4.1 Normal Method

This method is largely the same as before, except that the new forms must be submitted in place of the old ones. The 'normal method' will be used by applicants claiming full protected rights, which will include old approvals, which in general have taken a significant amount of time to assess, in order to identify the scope of approval.

B4.2 Fast-Track Method

This method is designed to reduce the handling time of the applications, and enables PLD to issue licences to applicants more quickly than by using the 'normal method'.

This system is designed to enable engineers to convert their basic licence, and <u>current active type ratings only</u>. Other older types previously held remain as protected rights and can be added at any time in the future should they be required.

This system should only be used for engineers applying to convert their basic licence and current approvals/ type ratings. PLD will be able to identify fast-track applications from a declaration made by the Quality Manager refereeing the application and support document.

Note 1: Applications submitted as fast track which do not represent the 'current approvals/type ratings only' concept, will be handled in accordance with our 'normal method' procedures.

Note 2: The CAA recognises that individual's protected rights for aircraft type authorisations not added to the licence will remain (where applicable) and these can be applied for at any subsequent future time when required by the individual.

A diagram showing the two different methods is shown at Appendix D to this Section.

B5 QUALIFICATIONS GIVING PROTECTED RIGHTS

Qualifications that may be included in a Part-66 licence issued to reflect 'protected rights' are as follows:

- Section L LWTR's on a valid BCAR Section L licence
- Section L Type Ratings on a valid BCAR Section L licence
- A8-13 Full CRS Type Authorisations (currently or previously held based upon acceptable type training)
- A8-3 Full CRS Type Approvals (only if current)
- A8-13 Limited CRS Authorisations (previously referred to as Limited and Simple)
- AWN 14 Limited CRS Authorisations (Certifying Mechanic schemes)
- Full CRS authorisations issued by a Part-145 organisation located within another EU/JAA Member State
- Only correctly issued approvals in accordance with approved schemes prior to 1 June 2001.

Authorisations to certify issued by an organisation outside the EU member states – even if it holds Part-145 approval – are intended to support the certification of maintenance under local regulations and do not constitute protected rights.

B6 CONVERSION OF BCAR LWTR TO PART-66 BASIC LICENCE

LWTR's on a valid licence granted or extended under BCAR Section L may be converted to a full or restricted Part-66 licence in the basic categories of B1 and/or B2 reflecting the combination of LWTR's held. The holding of a properly issued avionic extension approval granted by a Part-145 organisation in the UK will also be taken into account when transferring to the basic licence category. Where the sum of these does not constitute a full Part-66 category or sub-category, limitations will be added to reflect the extent of the individual's protected rights. These limitations are listed in Section B12.

If the licence holder qualifies for a B1 sub-category AML, the equivalent A sub-category AML will also be granted (excluding licences with limitations 10 & 11 applied).

Holders of a BCAR Section L licence may also qualify for the grant of Part-66 Category C AML. For further information refer to Section F.

Part and full conversion examinations as appropriate may be taken before or after the conversion process to remove limitations, which would otherwise apply. In most instances additional experience will also need to be demonstrated before qualifying for the full category or sub-category of a Part-66 AML.

A table covering the most common BCAR Section L to Part-66 licence conversion scenarios can be found in Appendix B.

B7 AUTHORISATION CONVERSION CRITERIA

B7.1 Conversion of A8 Authorisations

Protected rights also apply to authorisations granted on the basis of BCAR Section A8 approval schemes, which may vary from the current requirements of Airworthiness Notice 14. Many of these schemes were developed for an organisation's own needs and are not reflected in any published information. Before these privileges can be considered for transfer to a Part-66 licence, the CAA must establish the adequacy of training or examinations under these schemes when considering an individual's conversion. This can only be done with the full co-operation of the relevant Part-145 organisation.

Companies approved under BCAR A8-3 could 'approve' individuals to issue certificates of release to service in relation to work carried out on aircraft maintained within the organization, without the need to hold the appropriate BCAR Section L LWTR. Approval privileges excluded the certification of any maintenance, inspection or check associated with a scheduled maintenance input. The approval was therefore limited to certification for unscheduled defects and rectification. Unlicensed individuals who still hold authorisations based upon A8-3 approvals may claim protected rights but the entitlement will be evaluated when application is made for their transfer to a Part-66 licence.

Note: From 28 September 2006, certification of aircraft above 5700 kg MTOM must only be carried out by Part-66 licence holders.

B7.2 Conversion of Full Authorisations

Aircraft types on full type authorisations held on the basis of BCAR A8-13, A8-3 or Airworthiness Notice 14, may be transferred as part of the individual's protected rights.

In the UK, prior to the introduction of JAR-66 a full certification authorisation issued under then JAR-145, would normally have been based upon either the appropriate Section L LWTR plus an appropriate aircraft type training under the provisions of Airworthiness Notice No. 14 and subsequent type authorisation. A full certification authorisation would normally be both trade and aircraft type specific. It should also identify clearly the scope of the authorisation.

For aircraft above 5700kg, holding a BCAR Section L group type rating did not give an automatic entitlement to a type authorisation. The organisation would have established specific type competence by a course of training or by a practical period of familiarisation and evaluation on type. Therefore a Part-145 certification authorisation for aircraft above 5700kgs must be type specific in all cases and not simply cross-referred against the group type rating that may be held on a BCAR Section L licence.

Note: Limitations may be applied to reflect the basic licence held and/or the extent of training carried out.

B7.3 Conversion of Limited Authorisations

Those holding Limited Authorisations current at 1 June 2001 may be entitled to protected rights provided that the CAA is satisfied with the basis upon which these authorisations were granted since it may be issuing a licence based solely upon these authorisations.

Limited Authorisation was defined in Airworthiness Notice No. 14 and follows from the concept of Limited and Simple in BCAR A8-13. Notice No. 14 also provides for the 'Line Certifying Mechanic' scheme.

Section C

Section D

ш

Section

Section F

Section G

Section H

Section I

Section J

Section K

Under JAR-66, the Category A Line Maintenance Certifying Mechanic Licence replaced the previous provision for unlicensed certification. The Category B1 licence also includes provision for the 'Avionic Extension' concept. The Category B2 licence is a comprehensive avionic licence but there is no limited authorisation provision for mechanical privileges and therefore a Category A licence is required if such certification privileges are required.

An organisation will have verified the basis upon which limited authorisations were issued so that the CAA Personnel Licensing Department could identify any significant shortfall against the then JAR-66 licence requirements, now Part-66. All limited authorisations should have been based upon theoretical training as well as task-based training on the type relevant to the scope of the authorisation.

B8 CONVERSION OF LWTR'S OF SECTION L ISSUE 14 ONWARDS

BCAR Section L licences or LWTR's on a licence issued after 1 June 2001 were restricted to maintenance on aircraft below 5700 kg MTOM.

The majority of BCAR Section L licences will qualify under protected rights for licence conversion to a Part-66 AML. The Part-66 AML may have limitations applied to the basic licence and/or any aircraft types endorsed on it. Limitations applied will reflect the scope of the basic licence and aircraft type ratings/approvals held prior to conversion.

B9 NATIONAL PRIVILEGES ON CONVERSION

Any individual or group type ratings held on a BCAR Section L licence at the time of conversion will be transferred to an individual type rating, group rating or manufacturers group rating on the replacement Part-66 AML.

Mechanical and/or avionic paragraphs held on a BCAR Section L licence at the time of conversion will be transferred to the replacement Part-66 AML in the form of aircraft type ratings, group ratings or manufacturers group ratings.

Note 1: In order to claim an aircraft type rating/group rating or manufacturers group rating from mechanical and/or avionic paragraphs held. The applicant should make a statement of experience on the aircraft types claimed below 5700kg MTOM (supporting evidence may be required) or demonstrate a valid authorisation or authorisations issued by an approved organisation.

Note 2: Limitations will be applied to the aircraft type/ group/manufacturer group ratings reflecting the previous scope of certification privileges held. When certification privileges are held on aircraft that do not fall within the EASA aircraft listings (Annex II aircraft) the applicant will be returned their BCAR Section L licence in order that certification on these aircraft types may continue to be exercised. Annex II aircraft types will eventually be endorsed under National privileges on the Part-66 licence in the form of type ratings.

B10 ISSUE OF A CATEGORY A LICENCE TO A PREVIOUSLY UNLICENSED ENGINEER

The CAA Personnel Licensing Department requested that organisations approved in accordance with then JAR-145, detail any limited authorisation schemes in place and confirm those individuals that held such company authorisations. These submissions enabled the CAA to consider each scheme in terms of allowing valid unlicensed certifying privileges as a protected right.

The lists that were requested and subsequently provided by the organisations concerned provided the names of unlicensed certifying personnel with limited authorisations valid as of 1 June 2001. This excluded the following:

- Personnel who left the organisation before 1/6/01
- One-off approvals issued under BCAR A8-3
- Limited authorisations without CRS
- Ground running authorizations
- Boroscope authorizations
- Heavily restricted authorisations

In order to qualify, those applicants applying for a Category A licence as a protected right based upon limited and simple authorisations, must provide evidence of an authorisation issued by a UK JAR-145 (now Part-145) organisation in accordance with an approved scheme and issued before 1 June 2001.

B11 CONVERSION OF BCAR TYPE RATINGS TO PART-66 LICENCE

Aircraft types on a Section L licence may be transferred to a Part-66 licence under protected rights. In general, obsolete types not shown in the Part-66 list of type rating descriptions will not be transferred.

B11.1 A & C (Mechanical) Type Ratings

Type ratings for individual aeroplanes or helicopters will be transferred as type ratings in Category B1 with any

appropriate limitations and in Category C if the requirements of Section B14 are met. Refer to Section B8.

Mechanical paragraphs held on BCAR Section L licence at the time of conversion will be transferred to the replacement licence in the form of aircraft type ratings, group ratings or manufacturer group ratings. Refer to Section B8.

B11.2 X/R (Avionic) Type Ratings

Avionic paragraphs held on BCAR Section L licence at the time of conversion will be transferred to the replacement Part-66 AML in the form of group ratings or manufacturer group ratings. Refer to Section B8.

Where an incomplete suite of paragraphs for the full type rating is held, the type rating may be topped up either through completion of the normal Part-147 type course or directly approved course plus experience. This allows the grant of the Part-66 type rating or removal of limitations held against the type rating once granted.

Note: A group type rating does not automatically entitle the holder to certify work on an aircraft type with which he or she is not familiar. It is incumbent upon the individual to first familiarise themselves with the general characteristics of the aircraft, the manufacturer and the relevant airworthiness directives that apply to the aircraft type. A group type rating does not permit authorisation on aircraft listed in paragraph 14 of Airworthiness Notice No. 10.

B12 PROTECTED RIGHTS TO CATEGORY C

JAR-66 introduced the Category C licence, Base Maintenance Certifying Engineer, which is primarily a maintenance management licence that permits the holder to be authorised by a then JAR-145 approved maintenance organisation to release an aircraft following base maintenance. For the grant of Category C, Part-66 requires that an individual must have three years experience as a certifying technician in either Category B1 or B2. Since the Category C licence focuses upon the overall maintenance management of an aircraft during base maintenance and the subsequent single Certificate of Release to Service covering all trade disciplines, the CAA is unable to grant a Category C licence to the holder of only a single BCAR Section L LWTR.

Some individuals will have an entitlement at present to issue a Scheduled Maintenance Inspection Certificate of Release to Service (SMICRS) for checks, which include line and base maintenance. The SMICRS privilege is part of those duties expected of a Category C certifier but in view of the management responsibilities of this role it would be inappropriate to consider SMICRS privileges in only one licence category as being sufficient to justify the issue of a category C licence under 'protected rights'.

This reflects previous policy under BCAR A8-13 for single signatory base maintenance check release under a Certificate of Maintenance, which required two licence categories under Section L and CAA policy regarding the required licence coverage to be authorised to issue a Certificate of Maintenance Review.

On transfer of protected rights, Category C will only be issued to those who hold a BCAR Section L licence with a minimum of two Licence Without Type Ratings (excluding Compass Compensation and Adjustment) and for a minimum of three years held either:

Type ratings relating to aircraft in at least two LWTR categories, or

JAR/Part-145 Type Authorisations under at least two of the LWTR categories held, or

One type rating and one JAR/Part-145 Type Authorisation in different LWTR categories.

Note: For this purpose, Radio Communication and Navigation and Radio Radar together count only as one Licence Without Type Rating.

B13 LIMITATIONS ON A CONVERTED LICENCE

Limitation codes may be applied singly or in combination to basic categories and type ratings to reflect the scope of protected rights transferred to a Part-66 licence. The limitation codes and their translation which is printed on the reverse of the licence are listed below:

- 1. Excluding electrical power generation & distribution systems.
- 2. Excluding instrument systems, INS/IRS and Flight Directors systems.
- 3. Excluding autopilot systems on aeroplanes.
- 4. Excluding autopilot systems on helicopters.
- 5. Excluding automatic landing and auto throttle systems on aeroplanes.
- 6. Excluding radio communication/navigation and radar systems.
- 7. Excluding radio radar systems.

Section C

Section D

ш

Section

Section F

Ċ

Section

Section H

Section

Section J

¥

Section

- 8. Reserved.
- 9. Excluding avionic LRUs.
- 10. Excluding airframe.
- 11. Excluding engine.
- 12. Excluding all pressurised aeroplanes.
- 13. Reserved.
- 14. Excluding pressurised aeroplanes above 5700 Kg MTOM.
- 15. Excluding supercharged piston engines in aeroplanes.
- Excluding navigational and electronic instrument systems, FDR, GPWS and vibration monitoring systems.
- 17. Excluding radio-coupled autopilot systems in aeroplanes.
- 18. Excluding radio-coupled autopilot systems in helicopters.
- 19. Excluding all tasks with the exception of Compass Compensation and adjustment only.
- 20. Excluding propeller-turbine engines.
- 21. Excluding all tasks with the exception of minor scheduled line maintenance up to and including Daily Inspections.
- 22. Excluding all tasks with the exception of Cabin Maintenance tasks.
- 23. Excluding all tasks with the exception of DC electrical components in mechanical systems.
- 24. Excluding all systems with the exception of LRUs within In-flight Entertainment Systems.
- Excluding electrical power generation and distribution systems on aircraft above 5700 kg MTOW.
- 26. Excluding Avionic LRU replacement and BITE checks on aircraft above 5700 Kg MTOM.
- 27. Excluding Antenna and Antenna Feeder Systems relating to radio and radar systems.
- 28. Excluding maintenance tasks on Wooden Structures and Fabric Coverings.

B14 REMOVING LIMITATIONS FROM A BASIC LICENCE

To remove limitations from a basic B1 or B2 Part-66 licence, where protected rights do not directly convert to a full Part-66 Category/sub-category licence the relevant conversion examinations must be passed and any appropriate experience requirements met. Applications to remove limitations on a basic Category/ sub-category must cover all the limitations. Please refer to Appendix B to this Section and also sub-section B14 below for the removal of limitations.

B15 CONVERTING TO A NON-RESTRICTED (WITHOUT LIMITATIONS) BASIC CATEGORY LICENCE

To convert to a non-restricted Part-66 basic B1 or B2 category licence where protected rights do not directly convert to a full Part-66 Category/sub-category, the relevant conversion examinations need to be taken in addition to meeting any appropriate experience requirements. Appendix A to this Section contains a self-assessing table.

Where the appendix table does not cover a specific situation, an assessment will be required and applicants should apply in writing to Personnel Licensing Policy Department. Further information on examinations can be found in Section J.

Application should be made at the same time as that for conversion once the required conversion examinations and experience has been completed.

B15.1 Experience Requirement

Except in the cases listed in Appendix C to this Section, typically 6 months relevant additional experience is also required in the areas appropriate to the basic category/sub-category, which are not covered by protected rights showing evidence of the experience including detailed evidence of competence in the relevant basic skills.

Note: Category A

Limited Category A licences are issued to reflect the transfer of restricted privileges. In view of this, the holder of a Category A licence with any limitation must meet the full Category A examination and experience requirements to have the limitation removed.

B16 REMOVING LIMITATIONS FROM A TYPE RATING

Where the limitation applies only to the type rating, it can be removed by completing either an approved conversion course covering the differences or a full B1 or B2 type course as appropriate. This training must be conducted by a suitably approved Part-147 maintenance training organisation or be a type course approved by the CAA. The experience requirement as detailed in B15.1 is still required, except that the experience may be reduced. Please refer to H8.

B17 MAKING YOUR APPLICATION

Note 1: Refer to Appendix A to Section A for information on forms and guidance.

Form 19 (SRG/1014) should be used for all conversion applications

B17.1 Limited Authorisation & Full Authorisation 'Protected Rights' Applications

Form SRG/1020 confirms the entitlement to 'protected rights' by virtue of the individual being appropriately authorised on 1 June 2001. This document will give information on the authorisations held within the organisation at the date of application or upon the individual leaving the organisation before being issued with a Part-66 licence.

B17.2 Supporting Documents

The supporting information required, where applicable, in addition to Form 19 (SRG/1014) and Form SRG/1020 is listed below.

B17.3 Course Completion Certificates

Issued by CAA approved organisations or Part-147 organisations in other Member States

B17.4 Company Type Authorisations

Currently or previously held, depending on the method of conversion by which you are applying.

Note 2: Having clear concise supporting data will enable us to issue licences more efficiently and with less risk of rejections. The CAA will not contact the applicant for clarification of details on applications and therefore it is most important to have the correct information before applying.

B17.5 Additional Information

Where the authorisations relate to an incomplete rating, for example only the Airframe and not its engine, this would be reflected in the type rating endorsed on the licence.

If the request is for types previously authorised by a Part-145 organisation that is no longer trading or is

unable to supply course certificates or letters confirming training, each case will be reviewed individually. The CAA may however refuse to endorse the types requested if there is insufficient evidence for transfer.

Where course certificates have been issued by non-JAA/EU member states maintenance organisations, as part of a Part-145 approval, these will not be accepted unless supported by evidence that a Part-145 authorisation from an organisation within a full JAA/EU member state resulted from this training.

Where a type rating is already endorsed on the BCAR Section L licence it will be endorsed on the Part-66 licence without further requirement. It will however, be limited to the same extent as the Section L type rating and newly issued Part-66 licence.

B18 IF YOUR APPLICATION FAILS

If your application has been rejected for whatever reason you will be disappointed and want an explanation as to what went wrong. We aim to make sure that you understand the reason for rejection and to give clear guidance on how to get your application back on track.

Most common reasons for rejection are

- Quality Manager has not certified supporting documentation!
- Incomplete application forms!
- Licence not submitted!
- Incorrect fees!
- More detailed work experience i.e. logbook/ worksheet

B18.1 Complaints and Appeals

Whilst PLD endeavour to provide a high level of service to our Customers, inevitably there will be times when due to circumstances beyond our control, we exceed our published licence processing times. We are also regrettably unable to respond to enquiries of this nature, as this could further add to the delays in processing licence applications. All licence applications are dealt with in date order of receipt.

If you have a complaint or are appealing against a decision not to issue your licence, a letter should be addressed to: Head of Customer Service Unit, Personnel Licensing Department, CAA, Aviation House, Gatwick Airport South, West Sussex RH6 0YR.

The letter of complaint or appeal should include

- Your full name, date of birth and reference number.
- Full details of the complaint/appeal.
- Names of CAA staff handling your application/ enquiry.
- Any relevant contact/application dates.

B18.2 Procedure

Your letter of complaint/appeal will be passed to the Section dealing with your application, who will

acknowledge receipt of your letter of complaint/appeal within 10 working days, either with a full reply or a holding reply if further investigation is required.

If you are dissatisfied with the response, you should refer to the CAA Code of Practice for further guidance.

APPENDICES TO SECTION B

- Appendix A **Common Part-66 Conversion Scenarios**
 - Removal of Limitations from a Part-66 Licence
- Appendix B Appendix C **Exemption from Experience Requirement**
- **Diagram of Fast-Track Process** Appendix D

Section A

APPENDIX A COMMON PART-66 CONVERSION SCENARIOS

The tables below have been revised in order to simplify the conversion information. There will be some uncommon scenarios, which may not be suitable for self assessment (refer to Table 4). In this case, you may write to PLD Policy for confirmation, however, please note that we cannot respond to requests for confirmation of straightforward scenarios.

The first column in Tables 1 or 2 now list exclusions under BCAR Section L licence instead of the applicants actual licence privileges i.e. the elements of the BCAR Section L mechanical licence, which equate to the Part-66 B1 are broadly made up of Airframe, Engine, Electrical Systems and avionic extension (Avionic LRUs) where authorised. Where the licence privileges exclude avionic extension, Limitation 9 or 26 will be applied to the Part-66 licence on conversion.

Note 1: In Table 1 below, there are two different Limitations for Electrical and Avionic. The Limitation applied to your licence will depend on previous authorisations and privileges held. Note 2: Holders of BCAR 'X' Electrical licence will be entitled to both a B1 licence and a B2 licence with the appropriate Limitations attached.

Note 3: Holders of a B1 sub category will automatically be issued with a Category A licence in the same sub category except where the applicant receives Limitation 10 on the B1 licence. In addition, BCAR Avionic licence holders with mechanical 'Limited and Simple' authorisations for issue of a CRS may apply for the Category A licence (see Table 5).

Table 1 applies to BCAR Mechanical licence holders.

Table 2 applies to BCAR Avionic licence holders.

Table 3 applies to BCAR Full 'X' Electrical (only) licence holders.

Table 4 applies to less common Part-66 licence limitations.

Table 5 applies to 'Limited and Simple' unlicensed authorisations for the grant of a Part-66 Category A licence.

BCAR Excludes	Apply Part-66 Limitation(s)						
Airframe	10	Excluding airframe					
Engine	11	Excluding engine					
Electrical (licence without type rating or, basic licence and types above 5700 kg only)	1	Excluding electrical power generation & distribution systems					
Electrical (basic licence and type ratings below 5700 kg or type ratings above and below 5700 kg)	25	Under review					
Avionic Extension (licence without type rating or, basic licence and types above 5700 kg only)	9	Excluding avionic LRUs					
Avionic Extension (basic licence and type ratings below 5700 kg or, type ratings above and below 5700 kg)	26	Excluding Avionic LRU replacement and BITE checks on aircraft above 5700 kg MTOM					

Table 1 BCAR Mechanical

Note: The licence sub category issued i.e. B1.1, B1.2, B1.3 or B1.4 will be determined by the current licence held by the applicant i.e. aeroplanes/rotorcraft and turbine/piston power plants.

Table 2 BCAR Avionic

BCAR Excludes	Apply F	Part-66 Limitation(s)
Electrical	1	Excluding electrical power generation and distribution systems
Instrument Systems	2	Excluding instrument systems, INS/IRS and Flight Directors systems
Autopilot Systems (Aeroplanes)	3	Excluding autopilot systems on aeroplanes
Autopilot Systems (Helicopters)	4	Excluding autopilot systems on helicopters
Combined Category	5	Excluding automatic landing and auto throttle systems on aeroplanes
Radio Communication/Navigation & Radar Systems	*6	Excluding radio communication/navigation and radar systems
Radio Radar (only)	*7	Excluding radio radar systems

*Note 1: If Limitation 3 is applied Limitation 5 is also applicable.

*Note 2: Use Limitation 6 or 7 only.

Table 3 BCAR Full 'X' Electrical only

A full BCAR Section 'X' Electrical licence holder will be issued with both the Part-66 B1 category licence and the B2 category licence. The B1 sub category will be determined by the applicant's current licence for aeroplanes/ rotorcraft and piston/turbine power plants.

Category	Apply	Part-66 Limitation(s)	
B1 (any sub category)	9	Excluding Avionic LRUs	
	10	Excluding airframe	
	11	Excluding engine	
B2	2	Excluding instrument systems, INS/IRS and Flight Directors systems	
	3	Excluding autopilot systems on aeroplanes	
	4	Excluding autopilot systems on helicopters	
	5	Excluding automatic landing and auto throttle systems on aeroplanes	
	6	Excluding radio communication/navigation and radar systems	

Table 4 Less Common Part-66 Limitations

If any of the BCAR licences below are held (refer to the first column) and have not been superseded by subsequent licences, you will need to apply the relevant Part-66 Limitation, in addition to any other from the previous tables.

BCAR Licences	Apply F	Apply Part-66 Limitation(s)						
'A' Aeroplanes	12	Excluding all pressurised aeroplanes	l noi					
(Unpressurised Metal Aeroplanes)	28	Excluding maintenance tasks on wooden structures and fabric covering	Section					
'C' Engines (Unsupercharged Piston Engines)	15	Excluding supercharged piston engines in aeroplanes	K					
'X' Instruments (General Aircraft Instruments)	16	Excluding navigational and electronic instrument systems, FDR, GPWS and vibration monitoring systems	Section					

Section A

Section C

Section D

Section E

Section F

Section G

Section H

Section I

'X' Instruments (Flight Path and Air Data Computation)	16	Excluding navigational and electronic instrument systems, FDR, GPWS and vibration monitoring systems
'X' Automatic Pilots (Non radio-coupled automatic pilots - Aeroplanes)	17	Excluding radio-coupled systems in aeroplanes
'X' Automatic Pilots (Non-radio coupled automatic pilot - Rotorcraft)	18	Excluding radio-coupled autopilot systems in helicopters
'C' Engines (Jet Turbine Engines)	20	Excluding propeller-turbine engines

Table 5 'Limited and Simple' unlicensed authorisations for the grant of a Part-66 Category A licence Section B contains information on the issue of a Category A licence to a previously unlicensed engineer. Some authorisations will have been restricted and will therefore have the appropriate limitations endorsed on the Part-66 licence when issued.

Company Authorisation issued prior to 1 June 2001	Apply F	Apply Part-66 Limitation(s)						
Unrestricted	Nil	Nil						
Daily Check/Inspections	21	Excluding all tasks with the exception of minor scheduled line maintenance up to and including Daily Inspections						
Cabin Maintenance	22	Excluding all tasks with the exemption of Cabin Maintenance tasks						
Replacement of IFE system	24	Excluding all systems with the exception of LRUs within In-flight Entertainment (IFE) Systems						

REMOVAL OF LIMITATIONS FROM A PART-66 CATEGORY B LICENCE APPENDIX B

The tables listed in this appendix have been revised in order to simplify and combine the examination requirements both pre and post conversion.

Where part modules are shown, the full part module may not be required and therefore may be sub-divided. Applicants should refer to Part-66 Appendix I in order to identify the part module subjects required. This will be assessed by the CAA examination staff when applying for the exam, to ensure that the correct exam papers are given.

Table 1 Removal of Limitations from a Part-66 Category B1 Licence

BCAR Licences	B1 Sub-cat	Part-66 Lims										
			3	4	5	6	7	11	12	15	16	17
Aeroplanes 2 Turb-Eng (Aeros) Av Ext	B1-1	1	3.9 to 3.18	F			7.7	11.5 11.6 11.14				
Aeroplanes 2 Turb-Eng (Aeros) Electrical	B1-1	9			F							
Aeroplanes 2 Turb-Eng (Aeros)	B1-1	1, 9	3.9 to 3.18	F	F		7.7	11.5 11.6 11.14				
Aeroplanes 2 Jet/Turb-Eng (Aeros)	B1-1	1, 9, 20	3.9 to 3.18	F	F		7.7	11.5 11.6 11.14				F
Aeroplanes 2	B1-1	1, 9, 11	3.9 to 3.18	F	F		7.7	11.5 11.6 11.8 11.101 11.14		F		
Turb-Eng (Aeros)	B1-1	1, 9, 10	3.9 to 3.18	F	F		7.4 7.7 7.8 7.14 7.16 to 7.19					
Aeroplanes 1 Pist-Eng (Aeros) Av Ext	B1-2	1	3.9 to 3.18	F			7.7	11.5 11.6 11.14				
Aeroplanes 1 Pist-Eng (Aeros) Electrical	B1-2	9			F							
Aeroplanes 1 Pist-Eng (Aeros)	B1-2	1, 9	3.9 to 3.18	F	F		7.7	11.5 11.6 11.14				

Pist-Eng (Aeros)	B1-2	1, 9, 10	3.9 to 3.18	F	F		7.4 7.7 7.8 7.14 7.16 to 7.19	F			
Aeroplanes 1	B1-2	1, 9, 11	3.9 to 3.18	F	F		7.7	11.5 11.6 11.8 11.101 11.14		F	F
Turb-Eng (Heli) Av Ext	B1-3	1	3.9 to 3.18	F		6.3.2 6.3.3	7.7		12.8 12.15		
Turb-Eng (Heli) Electrical	B1-3	9			F	6.3.2 6.3.3					
Turb-Eng (Heli)	B1-3	1, 9	3.9 to 3.18	F	F	6.3.2 6.3.3	7.7		12.8 12.15		
Pist-Eng (Heli) Av Ext	B1-4	1	3.9 to 3.18	F		6.3.2 6.3.3	7.7		12.8 12.15		
Pist-Eng (Heli) Electrical	B1-4	9			F	6.3.2 6.3.3					
Pist-Eng (Heli)	B1-4	1, 9	3.9 to 3.18	F	F	6.3.2 6.3.3	7.7		122.8 12.15		

Table 2 Removal of Limitations from a Part-66 Category B2 Licence

F=Full Modules

BCAR Licences	Part-66 Lims							
		4	5	8	9	10	13	14
Radio Comm/Nav Radio Radar	1, 2, 3, 4, 5			F			13.1 13.3 to 13.5 13.7 to 13.9	F
Combined Cat (Inst/Autopilots)	1, 2, 3, 4, 6						13.1 13.3 to 13.6 13.9	
Radio Comm/Nav	1, 2, 3, 4, 5, 7			F			13.1 13.3 to 13.9	F
Autopilots (Heli)	1, 2, 3, 5, 6						13.1 13.3 to 13.8	F
Autopilots (Aeros) Radio Comm/Nav Radio Radar	1, 2, 4, 5						13.1 13.3 to 13.6 13.8 13.9	F
Autopilots (Aeros)	1, 2, 4, 5, 6						13.1 13.3 13.3 to 13.9	F

ection A	
š	

Instruments	1, 3, 4, 5, 6		F		13.1 13.3 to 13.7 13.9	
Instruments Radio Comm/Nav Radio Radar	1, 3, 4, 5		F		13.1 13.3 13.5 to 13.7 13.9	
Instruments Autopilots (Heli)	1, 3, 5, 6				13.1 13.3 13.4 to 13.7 13.9	
Instruments Autopilots (Aeros) Radio Comm/Nav Radio Radar	1, 4, 5				13.1 13.3 13.5 13.6 13.9	
Instruments Autopilots (Aeros)	1, 4, 5, 6				13.1 13.3 13.4 to 13.6 13.9	
Electrical Radio Comm/Nav Radio Radar	2, 3, 4, 5		F		13.1 13.3 13.4 13.7 13.8	F
Electrical	2, 3, 4, 5, 6	F	F		13.1 13.3 13.4 13.6 to 13.8	F
Electrical Autopilot (Heli)	2, 3, 5, 6				13.1 13.3 13.4 13.6 to 13.8	F
Electrical Autopilots (Aeros) Radio Comm/Nav Radio Radar	2, 4, 5				13.1 13.3 13.8	F
Electrical Autopilots (Aeros)	2, 4, 5, 6				133.1 13.3 13.4 13.6 13.8	F
Electrical Instruments Radio Comm/Nav Radio Radar	3, 4, 5		F		13.1 13.3 13.7	

Section D

Section C

Section E

Section F

Section G

Section H Section I

Section K

Index

Section J

	r	 	· · · · ·		,
Electrical Instruments	3, 4, 5, 6	F		13.1 13.3 13.4 13.6 13.7	
Electrical Instruments Autopilots (Heli) Radio Comm/Nav Radio Radar	3, 5			13.1 13.3 13.7	
Electrical Instruments Autopilots (Heli)	3, 5, 6			13.1 13.3 13.4 13.6 13.7	
Electrical Instruments Combined Cat (Inst/Autopilots) Radio Comm/Nav Radio Radar	4			13.1 13.3	
Electrical Instruments Autopilots (Aeros) Radio Comm/Nav Radio Radar	4, 5			13.1 13.3	
Electrical Instruments Autopilots (Aeros)	4, 5, 6			13.1 13.3 13.4 13.6	
Electrical Combined Car (Inst/Autopilots)	4, 6			13.1 13.3 13.4 13.6	
Electrical Instruments Autopilots (Aeros) Autopilots (Heli)	5, 6			13.3 13.4 13.6	
Electrical Combined Cat (Inst/Autopilots) Autopilots (Heli)	6			13.4 13.6	
Electrical Combined Cat (Inst/Autopilots) Autopilots (Heli) Radio Comm/Nav	7			13.4	

APPENDIX C EXEMPTION FROM EXPERIENCE REQUIREMENT

JAR-66 / Part-66 Category Held	Limitations Endorsed	Pre-conversion Protected Rights (aircraft below 5700 kg)
B1-1	20	Jet Turbine Engines
B1-1	9	No Avionic Extension
B1-2	9	No Avionic Extension
B1-3	9	No Avionic Extension
B2	3 & 5 (but not 4)	Autopilots Helicopter (not Combined Category or Autopilots Aeroplanes)
B2	4 & 5 (but not 3)	Autopilots Aeroplanes (not Combined Category or Autopilots Helicopters)
B2	4 (but not 3)	Autopilots Aeroplanes (not Autopilots Helicopters)
B2	5 (but not 3 or 4)	Autopilots Rotorcraft & Autopilots Aeroplanes (not Combined Category)

Note: Demonstration of experience is not required in order to remove above limitations from basic AML but is required for aircraft type endorsements.

Section A

Section C

Section D

Section E

Section F

Section G

Section H

Section I

Section J

Section K

Index

39

SECTION B

APPENDIX C

APPENDIX D DIAGRAM OF FAST-TRACK PROCESS

