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**PERFORMANCE OF MAINTENANCE TRAINING IN LOCATIONS NOT LISTED IN
ORGANISATION'S EXPOSITION**

1. INTRODUCTION

- 1.1 The following is an extract from Opinion 07/2015 published by EASA: "The current Annex III (Part-66) to Regulation (EU) No 1321/2014 allows that basic-knowledge examinations for maintenance certifying staff can be conducted either by an approved Part-147 Maintenance Training Organisation (MTO) or by the competent authority (CA). In the case of Part-147 MTOs, the examination can be performed either in conjunction with the basic-training course they provide or as a stand-alone examination.

Although there is no safety concern in relation to the examinations performed by Part-147 MTOs when they are part of a basic-training course (typically lasting between two and three years), this is not the case with stand-alone basic examinations. A significant number of fraud cases in approved Part-147 MTOs providing unofficial training lasting only for a few days have been reported, where said MTOs released focused information on the content of the upcoming examination to their students. These practices take place in and outside Europe, mostly away from the base of the Part-147 MTO, where oversight by the CA is more difficult to exercise or even impossible to plan.

The situation has spiraled quickly out of control as, progressively, more Part-147 MTOs have been following this practice, enticing their customers with very short, so-called 'refresher courses' supposed to guarantee them that they would pass the official Part-147 examination. In some cases, fraud or malpractice has been confirmed by EASA or the CAs, which necessitated action being taken against the issued licenses or certificates. This has generated a major safety concern, with the risk of having the aviation system overwhelmed with license holders releasing to service aircraft after maintenance without having the basic knowledge required.

EASA therefore proposes restrictions to the stand-alone basic examinations when they are performed outside the locations listed in the approval certificate of the maintenance training organisation. This would address the immediate safety concern without the significantly higher impact of completely removing the privilege of Part-147 MTOs to perform examinations".

- 1.2 This Opinion was the outcome from feedbacks received by several Competent Authorities and the situation was classified as an immediate safety concern. The changes proposed in this Opinion have the objective of addressing the immediate safety concern without the significantly higher impact of completely removing the privilege of Part-147 MTOs to perform examinations.
- 1.3 Taking into consideration the above, the Cyprus Department of Civil Aviation issues this circular detailing the procedure and requirements for an approved by Cyprus DCA Part-147 Organisation to follow when planning to conduct any form of maintenance training under its approved privileges in

a location not listed in the approved exposition. Maintenance training is defined as the performance of theoretical or practical elements, knowledge examinations and practical assessments as part of a Basic Part-66 Training course.

2. ORGANISATION'S OBLIGATIONS

- 2.1 Current regulation EASA Part 147.A.145 (c) states that “the maintenance training organisation may only conduct training, knowledge examinations and practical assessments in locations different from the locations listed in approval certificate or listed in MTOE in accordance with a control procedure specified in the MTOE. Such locations need not be listed in MTOE”.
- 2.2 As regulation above states, Organisations should have a control procedure in the approved exposition describing all aspects governing the conduct of training activities performed in such locations. Usually these procedures will be listed under exposition sections 2.8 & 2.16. However, since exposition and its subsequent amendments is a control document under DCA's final approval, the above procedures when reviewed may be accepted or not, thus allowing or not the Organisation to exercise this privilege.

The Department on reviewing the above procedures will take into consideration several parameters such as, Organisation's overall activities, structure, manpower resources, audit results etc.

- 2.3 Organisations granted the above privilege through exposition approval, may conduct such training activities provided they have previously informed DCA for such intention and requesting acceptance to do so. In more detail:
- a. DCA should be informed at least 30 days in advance for the potential of such activity. The information should be as detailed as possible giving exact location, dates and type of training. This is necessary so as to allow the DCA sufficient time for examining the request and to plan, if deemed necessary, the audit of that activity or training facility.
 - b. The Organisation should prepare and submit a manpower analysis indicating personnel availability for this additional activity in conjunction with any other running training activities. This should take into consideration training preparation (theoretical syllabus & examinations), instructors' availability, invigilators, oversight etc.
 - c. In addition to the above, the Organisation should take into consideration student's culture and any extra precautions that might be necessary to be taken (number of invigilators, training video recording, etc.).
 - d. Internal audit reports for acceptance of training facilities should also be available to DCA for review.
- 2.4 The Department taking into consideration aviation industry needs and the way that trainings are scheduled and booked, has decided to **exclude** from the above the performance of any maintenance training being part of an Aircraft Type Training Course.

However, the Organisation still has the obligation to follow approved MTOE procedures (i.e. pre audits, facilities acceptance etc.) and to inform the Department for such a training providing details as described in paragraph (a) above.

The Department anytime between training duration may perform an audit of training performance since such trainings usually last between 10-30 days.

3. AUTHORITY REVIEW PROCEDURE

- 3.1 The Department on receiving the above request and all supporting documentation will examine Organisation's competency for the performance of the requested training. Additional measures may be requested to safeguard training liability.

The Department as part of its oversight responsibilities to ensure that Part-66/147 requirements are followed may also choose to perform an audit either of the training facilities or of training performance. Other factors that will be considered are Organisation's previous audit reports, corrective actions, and previous activities.

The Department may also inform the Competent Authority of that country's where training is to be conducted for further information or even to conduct an audit on behalf of DCA.

- 3.2 The Organisation will be notified in writing about Department's review and if any further actions are required.

It should be clear that each request will be reviewed on a case by case without pre-determining acceptance even if a previous request was positive.

- 3.3 The Department reserves the right as per Part-147.B.130 (a) to limit organisation's approval i.e. removing the privilege for training in other locations, if findings during performed audits or any other incidences justified so.

4. Further Information

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