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AC 66-1 (draft) Revision 4 – Aircraft Engineer Licence - General

The Aircraft Electronics Association (AEA) appreciates the opportunity to comment on the Civil Aviation Authority of New Zealand draft Advisory Circular 66-1 Aircraft Maintenance Personnel Licence - General.

The Association represents more than 1,300 aviation businesses worldwide, as well as 19 approved maintenance organisations in New Zealand. The AEA membership includes approved maintenance organizations, avionics manufacturers, educators and operators. In general the Aircraft Electronics Association supports the proposed changes to AC 66-1 with the following changes.

The Association disagrees with the Advisory Circular as written. The Association further suggests that the AC be withdrawn, and an avionics industry group be established to address the intended “acceptable means of compliance” to part 66 that the AC is attempting to address.

The AC takes exceptional literary license in establishing and expanding on basic concepts offered in Amendment 7 to Part 66 effective 01 September 2020. The AC in essence is establishing regulatory limitations not intended in the regulation. Among other issues, the broad-based definition of avionics used is far beyond the intent to support a classification of complex avionics. The AC randomly combines all of B.2 Types of Electrical, Instrument, and Radio into a broad definition of Avionics. And then, leveraging the broad definition of avionics to define complex avionics as any integration of EIR systems as viewed in the “eye of the CAA at the time of type acceptance.” That is NOT a regulatory basis for type training.

While today’s “modern” avionics is new and novel, they are no different than the new and novel avionics of the past generation transition. Avionics should not in and of themselves require a unique aircraft rating. Electrical, Instrument, and Radio technicians do have a requirement to be qualified on the technology they are working on.

The integration of radio and instrument systems has existed in aircraft for nearly a century. Navigation information displayed on instruments has been a staple of instrument flight since its inception. The integration with radio and instrument information has been an essential element of flight management systems since the invention of autopilots. The

integration of auto-flight, auto-throttles, and auto-land systems has been demonstrated for nearly 50 years. The industry and authority have always relied upon the existing “qualifications” requires to assure that the technician responsible for the maintenance and return to service was properly trained, qualified, and authorized to perform the specific maintenance task. Which begs the question: what changed?

Many of the newer general aviation avionics systems offer integration into the pilot information and aircraft operation as compared to legacy instrumentation. However, from a technical and regulatory perspective, todays integrated displays are no more, and in many cases, lesser integrated than legacy cockpits. In addition, the enhanced requirements for installation procedures and continued airworthiness instructions have mitigated many of the challenges faced with the installation and integration of legacy systems. Unfortunately, without the benefit of close coordination with the current industry, many of the apparent assumptions used in the development of this advisory circular are based on false logic.

The Association and its membership stand ready to assist the CAA is clearly defining the problem they are attempting to resolve and to develop a solution that solves the problem. The AC as written is simply not acceptable.

The Aircraft Electronics Association appreciates the opportunity to comment on this proposal. Should you have any questions, please do not hesitate to contact us at 01-202-589-1144 or email at: ricp@aea.net.

Sincerely,

A handwritten signature in black ink that reads "Richard Peri". The signature is written in a cursive, flowing style.

Richard A. Peri
Vice President
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