



European Aviation Safety Agency

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Mr Manfred Bialonczyk
Bundesministerium für Verkehr,
Innovation und Technologie
Sektion II - Straße und Luft - L3
Radetzkystrasse 2
A-1030 Wien
Austria

Subject: Agency position regarding Decisions 2007/001/R, 2007/002/R and 2007/003/R amending Decision 2003/19/RM (AMC to Part-145, Part-M and Part-66), related to Fuel Tank Safety training

Dear Mr Bialonczyk,

The Agency held on 23 November 2007 in Cologne, a workshop to discuss concerns raised after the publication in March 2007 of three decisions¹ issuing AMCs detailing, inter alia, general instructions on the training to be provided to maintenance and continuing airworthiness management personnel on the issue of Fuel Tank Safety so as to make them aware of the related airworthiness limitation items, including CDCCLs (Critical Design Control Configuration Limitations).

Although mainly addressed to NAAs, this workshop was also attended by representatives of AEA, IACA and a manufacturer so as to allow them setting the scene and providing examples of their concerns (these concerns are those described in my previous letter YMO/FKN/ime/R(4) 2007(D)52380 dated 21 June 2007).

The conclusions of the workshop are presented on the Agency website. They explain that new Decisions will be published which will replace the three initially issued. These new decisions are expected to be published in May 2008 following an accelerated rulemaking process.

In order to properly address the period between the date of entry into force of the current decisions and that of the revised ones, the Agency considers that interim measures should be implemented so as to prevent any safety gap while avoiding that measures, which will be changed soon, are unnecessarily implemented.

¹ Decisions 2007/001/R, 2007/002/R and 2007/003/R amending Decision 2003/19/RM (Acceptable means of Compliance (AMC) to Part-145, Part-M and Part-66)

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Maintenance regulations require indeed that personnel are appropriately trained. Providing no training at all until the revised AMCs are issued is, therefore, not an option. However, the current decisions contain an elaborated training scheme that need time to be fully implemented. As a consequence, the Agency suggests, as AMCs are not binding any how, that National Authorities adopt, in addition to the existing Agency AMCs, national ones that would anticipate on the revision being performed by the Agency. To allow NAAs issuing such national AMCs, please find hereunder the intent of the future Agency AMCs.

Two levels of training will be recommended:

- an awareness training (level 1) which may take the form of a bulletin, addressed to all personnel involved in maintenance and in management of airworthiness of the aircraft, and
- a detailed training (level 2) addressed only to the personnel that are recommended to have level 2 training in accordance with the current decisions.

A flexible period will be given by the authorities to allow organisations to set the necessary courses and impart the training to the personnel, taking into account the organisation's training schemes/means/practices. The objective will be level 1 training to be in place by the end of March 2008 and level 2 by the end of 2010.

The training courses do not need to be approved directly by the authority, but since they are part of the CAMO and MO expositions, they have to be approved through amendments to the expositions.

You are invited therefore to produce the necessary national AMCs on these bases as soon as possible and report any difficulty. The Agency will provide any necessary assistance to facilitate this task.

Yours sincerely,

C. PROBST

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Yves Toriel