



EUROPEAN GLIDING UNION

Representative Organisation of European Glider Pilots

Comments on NPA 2008-03

Explanatory Note IV. A) Background information

17. Conversion

The European Gliding Union (EGU) disagrees with the proposal not to implement provisions for the conversion of national qualifications. Actually EGU urgently requests such provisions. Justification:

In some Member States aero clubs offered its members theoretical and practical maintenance training including examination. Especially in those Member States which currently do not have a state licensing system for this type of certifying staff aero clubs established their own training and examination system. Based on such systems sailplanes and powered sailplanes have been maintained for several decades at an appropriate safety level. EGU believes that it is reasonable to allow competent authorities to decide whether a conversion report can be established or not.

Solution:

EGU suggests to enable the provisions of 66.A.70 and 66.B Subpart D for the conversion of ELA-licences.

17. Crediting

For those persons who obtained aero club internal training which can actually not easily converted, the crediting provisions of 66.A.25 (b) (Full or partial credit against..) should be kept in any case. The provisions of Section B, Subpart E should also be kept and enabled for ELA-Licences

Justification:

In some Member States aero clubs offered its members theoretical and practical maintenance training including examination. Especially in those Member States which currently do not have a state licensing system for this type of certifying staff aero clubs established their own training and examination system. It's reasonable that some of the knowledge obtained should be credited.

66.A.25

Paragraph (b) should of present Part 66 should be kept for crediting of basic knowledge.

Justification:

It seems to be envisaged to that this paragraph is to be deleted. This might be an editorial mistake. In this case the numbering should be reviewed.

Additionally it was not in the TOR to remove this provision from 66 licences other than B3 and ELA. Furthermore it makes sense to enable that rule also for B3 and ELA-licences.

Appendix VI to Part 66

Module 4. Airframe

Consultation of our members showed that there are some misunderstandings concerning the combination of modules necessary pursuant to AMC 66.A.25 (b)

This module was drafted with the intention to cover pure wooden airframes and airframes being composed of wooden wings and metal tube fuselages. This was a very common combination from the 40ties up to 60ties. Examples for that are Ka 8, ASK 13, Bergfalke, SF-25, Pa-18.

Therefore a clarification of the wording 'composite' as synonym for a combination of wooden wings and metal tube fuselages seems to be necessary.

AMC 66.A.30

The Appendix II may have to be adapted to typical tasks covered by Basic-ELA and Full-ELA licences. Especially maintenance tasks for balloons are not covered.