

PART 66L

June 27 and 28th 2023

Issues facing
balloon
(and sailplane)
engineers under
Part 66 L



What are the problems?

Most engineers are not employed by a Maintenance Organisation but are volunteers or very part time workers

Getting the licence/qualification

Keeping the licence/qualification

More rules and regulations in the making

Many rules and regulations are written for fixed wing and copied for balloons and sailplanes

Learning objectives do not match daily practice



Renewing the Part 66 L licence:

A crisis is
coming in
2025

Recency requirements are 6 months
experience in the past 2 years (50 days)

This requirement is unrealistic.
Most balloons have one maintenance contact with CAO per year.
Many engineers “work” only on summer weekends

More realistic would be a specific number of tasks per two year
period

Most licences will have to be renewed in 2025/26 and the
recency requirements will not be met by a lot of highly
experienced and essential engineers.

Proposal for recency requirements for the the Part 66 L licence:

Keep engineers
legal and
licensed

AltMoc to AMC 66.A.20(b)(2) for L3H, L3G and L4H working under CAO for balloons/airships and sailplanes. (or new AMC)

6 months maintenance experience
interpretation: 4 annual or 100 hour inspections in the past 2 years

If fewer than 4 annual/100 hour inspections are performed these should be replaced by 5 maintenance tasks

When holding more than one rating at least one 100 hour or annual inspection per two years should be performed.

If privileges must be reinstated this can be done under supervision until experience has been regained

Getting the Part 66L licence

We need
engineers in
the future

Fixed wing “apprenticeship” does not apply to ballooning.

Maintenance Organisations are unwilling / unable to be “employers” for new engineers

Learning objectives for module 3L need to be more specific and clear on what is required for balloon engineers under Part ML & Part CAO

Module 12L not relevant for L3H and L3G (no permanently installed electronics).

These issues needs to be solved in a practical manner rather quickly before it becomes an existential problem.

Proposal for engineer training

Engineers can train outside Maintenance Organisations

AMC for “training schools”, for example by EBF or national federations.
(not complex Part 147 type organisations)

AMC for content of training course for balloon / airship / sailplane engineers

Module 12L removed for balloon engineers
Module 3L question bank thoroughly reviewed

Review of Part 66

We must not accept heavier regulations

Standstill periods for exams do not exist today for the L licences and should not be introduced

Opportunity to simplify and lighten Rules: EBF and EGU need to become involved in rulemaking, as per Parts BFCL, BOP, DTO etc.

Current issues cannot wait for next revision of Part 66