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**TITLE : CONVERSION OF PART-66 PROTECTED RIGHTS AND REMOVAL OF LIMITATIONS**

## **INTRODUCTION**

The purpose of this Advisory Memorandum is to outline the requirements for conversion of 'Protected Rights' to a Part-66 AML and for removal of limitations associated with conversion of protected rights.

The Irish Aviation Authority availed of the provisions of Commission Regulation (EC) No 2042/2003 Article 7, which permitted a Member State to defer application of the provisions of Annex III, these deferral periods have now expired.

Individual certifying staff and certifying staff approved by maintenance organisations, involved with the maintenance and certification of maintenance of aircraft and products which are subject to the requirements of EC216/2008, must be in compliance with the provisions of (EC) No 1321/2014 Annex III as amended.

## **GENERAL**

All applicants for a Part-66 licence are obliged to make themselves familiar with Part-66 and the associated Acceptable Means of Compliance (AMC) and Guidance Material (GM). These are available on the EASA web site at [www.easa.europa.eu](http://www.easa.europa.eu).

## **QUALIFICATIONS AND PROTECTED RIGHTS**


In accordance with Part-66.A.70 the holder of a certifying staff qualification valid in a member state prior to the date of entry into force of Part-66 shall be issued an aircraft maintenance licence without further examination in accordance with the Conversion Report developed by the competent authority in that Member State. This is referred to as 'protected rights'. Protected rights apply to basic qualifications and type qualifications.

### **Basic Qualifications**

The basic certifying staff qualification in Ireland was the Basic Aeronautical Engineering Certificate (BAEC) and qualifies for conversion in accordance with the conversion report and outlined in this document. An Irish Aircraft Maintenance Engineers Licence (AMEL) issued before the introduction of the BAEC will also qualify for conversion to a Part-66 basic licence.

### **Type Qualifications**

Type ratings on an Irish AMEL will qualify for type rating on a Part-66 AML. Type ratings on a Part-145 authorisation based on the BAEC plus type training and/or AMEL qualifications issued by a Part-145 approved maintenance organisation in an EU full member State will also qualify for type ratings on a Part-66 AML.

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## QUALIFICATIONS WITH NO ‘PROTECTED RIGHTS’ ENTITLEMENT

It should be noted that some authorisations issued under Part-145 do not qualify as ‘protected rights’ since they are not certification authorisations, i.e. pre-flight or turn around inspection authorisations. One-off authorisations also do not qualify.

It should also be noted that personnel employed in Part-145 organisations located outside of the EU, where the Part-145 organisation is approved by an EU member state, do not have entitlement to ‘protected rights’ even though they hold a certification authorisation unless they qualify through holding a BAEC or Irish AMEL. This reflects the fact that Part-145 does not impose the requirements of Part-66 on such organisations, looking instead for a measure of equivalence.

## CONVERSION LIMITATIONS

Limitations will apply to a Part-66 AML on conversion unless the protected rights meet the full requirements for the particular Category. Part-66 Category B1 Aeroplanes Turbine is the equivalent of BAEC Parts 2, 4 & 6 and the Category B2 equates to BAEC Parts 6, 7 & 8.

Applicants for the Category B2 rating who hold the BAEC Part 6 are also entitled to a B1 rating limited to the electrical system and the electrical components of mechanical systems on the basis that that privilege is transferred from the avionics category to the mechanical category.

Limitations are outlined on pages 5 and 6.

The basic limitations will also apply to type ratings but additional limitations may apply to type ratings if the scope of the type rating does not cover the scope of the basic qualifications held.

To qualify for the Category C rating an applicant must hold B1 or B2 privileges with the scope of at least two BAECs and have exercised such privileges covering the scope of one full BAEC for at least three years, one year of which was in base maintenance.

To qualify for an unlimited Category A rating an applicant must hold BAEC Parts 2 & 4, Parts 2 and 3, Parts 5 & 4 or 5 & 3 as appropriate to the sub-category. Some organisations have approved certifying staff for limited mechanical tasks, for example, daily inspection that are not based on BAEC Parts 2 & 4. Such certifying staff are entitled to a Category A rating limited to reflect the specific tasks authorised provided that they held the authorisation before 1st June 2001.

To qualify for the full Category A rating such certifying staff must meet all of the Part-66 Category A knowledge requirements. Note; Categories A only applies in a Part-145 organisation.


## CONVERSION OF TYPE RATINGS

### Type Ratings

Individual aircraft type ratings are granted for specific aircraft and engine combinations as listed in AMC Appendix 1. Individual type ratings may be granted for Group 1, 2 and 3 aircraft.

### Group ratings

Part-66 provides for group ratings for aircraft other than those in Group 1 (see ED Decision PLAM 023

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2013/024/R).

The following Group ratings may be granted;

Group 2 aircraft

Category B1 and C licence holders may be granted a **manufacturer sub-group rating** which requires complying with the aircraft type rating requirements of at least two aircraft types from the same manufacturer which combined are representative of the applicable manufacturer sub-group.

Category B1 and C licence holders may be granted a **full sub-group ratings** which requires complying with the aircraft type rating requirements of at least three aircraft types from different manufacturers which combined are representative of the applicable sub-group.

Category B2 licence holders may be granted a manufacturer sub-group and/or a full sub-group ratings which require demonstration of practical experience which shall include a representative cross section of maintenance activities relevant to the licence category and to the applicable aircraft sub-group.

Group 3 aircraft

Category B1, B2 and C licence holders may be granted a full group 3 rating which requires demonstration of practical experience, which shall include a representative cross section of maintenance activities relevant to the licence category and to the group 3. For category B1, unless the applicant provides evidence of appropriate experience, the group 3 rating shall be subject to structural limitations as described in Part-66.


Note: Structural limitations should not be confused with conversion limitations described above.

Previously issued Group ratings as listed below remain valid and will be converted to the new Group ratings at or before the next renewal date of the licence.

### **Mechanical groups**

Helicopter piston engine  
Helicopter turbine engine  
Aeroplanes single piston engine – metal structure  
Aeroplanes multiple piston engine – metal structure  
Aeroplanes single piston engine – wooden structure  
Aeroplanes multiple piston engine – wooden structure  
Aeroplanes single piston engine – composite structure  
Aeroplanes multiple piston engine – composite structure  
Aeroplanes turbine – single engine  
Aeroplanes turbine – multiple engine

### **Avionic groups**

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Aeroplanes  
Helicopters

Note: The procedure for the conversion of older group ratings to the new Group ratings is described further in 66.B.125. This conversion process which results from an amendment to E2042/2003 should not be confused with the 'Conversion of Protected rights' which is the subject of this PLAM.

### **CAPTURE OF 'PROTECTED RIGHTS'**

Each applicant for conversion should ensure that all of his/her 'protected rights' are captured. It is important therefore to ensure that each applicant applies for conversion of **all** his/her 'protected rights' at the time of the initial application. Once 'protected rights' are converted to a Part-66 licence all future Part-145 authorisations must be based on the Part-66 licence only.

**Note: Once 'protected rights' are converted all future type ratings must meet the requirements of Part-66.A.45.**

### **APPLICATION FOR CONVERSION OF PROTECTED RIGHTS**

Where an applicant holds protected rights from another EU member state he/she should make application to that state for conversion and such converted AML would be accepted here.

Where an applicant holds Irish protected rights and protected rights from another EU member State the application may be made to either State. However where such an application is made to this Authority it may take some time to establish what conversion criteria apply to protected rights obtained in that other State.

Application forms (EASA Form 19) are available from the Personnel Licensing Office, Irish Aviation Authority, The Times Building, 11-12 D'Olier Street, Dublin 2 or on the IAA web-site [www.iaa.ie](http://www.iaa.ie).


An applicant for conversion of protected rights to a Part-66 Aircraft Maintenance Licence (AML) must complete EASA Form 19 and send it with the required fee and any supporting documentation required to the Personnel Licensing Office, Irish Aviation Authority, The Times Building, 11-12 D'Olier Street, Dublin 2.

The following documentation should be submitted to support the application:

- completed application form (EASA Form 19)
- copy of all relevant BAECs
- Irish AMEL (if applicable)
- certified copy of all type training certificates for which type ratings are requested (this does not apply to type ratings held on an AMEL)
- copy of Part-145 authorisations including explanation of codes used.
- Fee (refer to the current fees order available on [www.iaa.ie](http://www.iaa.ie))

Only originals or verified true copies of documents should be submitted, verified true copies should be verified by the Quality Manager or other EASA Form 4 holder of an IAA approved maintenance organisation or maintenance training organisation.

Maintenance experience must be written up in a manner that the reader has a reasonable

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understanding of where, when and what maintenance constitutes the experience. The experience record should indicate the category of maintenance experience i.e. mechanical or avionic. The experience record need only reflect experience pertinent to the application. It is acceptable to cross-refer in the EASA Form 19 to other documents containing information on maintenance experience provided that a person acceptable to the Authority countersigns such experience.

The application form should identify the type ratings requested as listed in AMC Appendix 1 including group ratings.

It is very important that the application form is fully completed. Failure to do so may result in rejection of the application or delays in processing it.

## REMOVAL OF LIMITATIONS FROM A Part-66 AML ALREADY GRANTED AGAINST ‘PROTECTED RIGHTS’

### Basic Limitations

Basic limitations can be removed before or after conversion by passing the relevant Part-66 Module examinations as outlined on pages 7, 8 and 9 and providing verified experience covering the additional privileges associated with the removal of the limitation. Training is not mandatory in order to sit the conversion examinations.

An applicant for removal of limitations from a Part-66 AML already granted against protected rights must complete EASA Form 19 and send it with the required fee and any supporting documentation required, including the applicant’s AML, to the Personnel Licensing Office, Irish Aviation Authority, The Times Building, 11-12 D’Olier Street, Dublin 2.

An applicant must qualify for removal of all limitations pertaining to a full category for example the holder of a limited B1 category must pass all of the examinations required to remove all of the limitations in respect of that category.


### Type limitations

When the holder of a limited licence containing type-ratings qualifies for removal of the limitations to the basic licence he/she will qualify for removal of the associated type rating limitations provided he/she has received type training covering those limitations.

For example if the holder of a B1 licence limited to exclude the electrical system and with a type rating for the Agusta A109 (Turbomeca Arriel 1) qualifies for removal of the basic limitations by passing the additional module/part module examinations will also be entitled to a full type rating for the Agusta A109 (Turbomeca Arriel 1) if he/she has completed type training on the electrical system of that aircraft.


### FEES

Fees for conversion of protected rights and removal of restrictions are prescribed in the Irish Aviation Authority (Fees) Order.

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### BAEC TO Part-66 AML (MECHANICAL) CONVERSION WITHOUT EXAMINATION – LIMITATIONS


BAEC PART(S) HELD	Part-66 Category	Limitation(s) after conversion.
Part 1	B1/B3 Aeroplanes Piston	Limited to unpressurised aeroplanes excluding engines, electrical system and electrical components of mechanical systems. Limited to replacement of avionic equipment (except systems associated with the engine) where functional checks to prove serviceability do not require the use of test apparatus.
Part 3	B1/B3 Aeroplanes Piston	Limited to engine only. Limited to replacement of avionic equipment associated with the engine where functional checks to prove serviceability do not require the use of test apparatus.
Part 1 & 3	B1/B3 Aeroplanes Piston	Limited to unpressurised aeroplanes excluding electrical system and electrical components of mechanical systems.
Part 1, 3 & 6	B1/B3 Aeroplanes Piston	Limited to unpressurised aeroplanes.
Part 2	B1 Aeroplanes Piston & Turbine	Limited to aeroplanes excluding engines, electrical system and electrical components of mechanical systems. Limited to replacement of avionic equipment (except systems associated with the engine) where functional checks to prove serviceability do not require the use of test apparatus.
Part 4	B1.1 Aeroplanes Turbine	Limited to engine only Limited to replacement of avionic equipment associated with the engine where functional checks to prove serviceability do not require the use of test apparatus.
Parts 2 & 4	B1.1 Aeroplanes Turbine	Excludes electrical system and electrical components of mechanical systems.
Parts 2,4 & 6	B1.1 Aeroplanes Turbine	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>
Parts 3 & 5	B1.4 Helicopters Piston	Excludes electrical system and electrical components of mechanical systems.
Parts 3,5 & 6	B1.4 Helicopters Piston	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>
Parts 4 & 5	B1.3 Helicopters Turbine	Excludes electrical system and electrical components of mechanical systems.
Parts 4,5 & 6	B1.3 Helicopters Turbine	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

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### BAEC TO Part-66 AML (AVIONICS) CONVERSION WITHOUT EXAMINATION – LIMITATIONS

BAEC PART(S) HELD	Part-66 Category	Limitation(s) after conversion.
Part 6	B2 Avionics B1	Limited to electrical system Limited to electrical components of mechanical systems
Part 7	B2 Avionics	Limited to radio systems
Part 8	B2 Avionics	Limited to instruments systems, compasses and autopilot systems
Parts 6 & 7	B2 Avionics B1	Limited to electrical and radio systems Limited to electrical components of mechanical systems
Parts 7 & 8	B2 Avionics	Excludes electrical system
Parts 6 & 8	B2 Avionics B1	Excludes radio system Limited to electrical components of mechanical systems
Parts 6,7 & 8	B2 Avionics B1	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a> Limited to electrical components of mechanical systems

Note; The holder of a BAEC Part 6 is also entitled to a Category B1 AML - limited to the electrical components of mechanical systems.

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### BAEC to Part-66 AML Category A (MECHANICAL) CONVERSIONS WITH EXAMINATIONS

BAEC PART(S) HELD	Module Examinations required for conversion to Category TA1.1
2	3,5,7, 11, 15 & 17
4	3,5,7 & 11
6	6, 7, 11a, 15 & 17
2 & 4	3,5,7 & 11
2,4 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

BAEC PART(S) HELD	Module Examinations required for conversion to Category TA1.2
2	3, 5, 7, 11b, 16 & 17
3	3, 5, 7, & 11b
6	6, 7, 11b, 16 & 17
2 & 3	3, 5, 7, 11
2,3 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

BAEC PART(S) HELD	Module Examinations required for conversion to Category TA1.2
1	3, 5, 7, 11b, 16 & 17
3	3, 5, 7, & 11b
6	6, 7, 11b, 16 & 17
1 & 3	3, 5, 7, 11b
1,3 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>




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BAEC PART(S) HELD	Module Examinations required for conversion to Category TA1.3
5	3, 5, 7, 12 & 15
4	3, 5, 7 & 12
6	6, 7, 12, 15
4 & 5	3, 5, 7 & 12
4, 5 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

BAEC PART(S) HELD	Module Examinations required for conversion to Category TA1.4
5	3, 5, 7, 12 & 16
3	3, 5, 7 & 12
6	6, 7, 12, 16
3 & 5	3, 5, 7 & 12
3, 5 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

Holders of BAECs seeking conversion of a protected right towards the issue of a category L aircraft maintenance licence should contact [licensing@iaa.ie](mailto:licensing@iaa.ie)


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### BAEC to Part-66 AML Category B (MECHANICAL) CONVERSIONS WITH EXAMINATIONS

BAEC PART(S) HELD	Module Examinations required for conversion to Category TB1.1
2	3, 4, 5, 7, 11a, 15 & 17
4	3, 4, 5, 7 & 11a
6	6, 7, 11a, 15 & 17
2 & 4	3, 4, 5, 7 & 11a
2, 4 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>


BAEC PART(S) HELD	Module Examinations required for conversion to Category TB1.2
1	3, 4, 5, 7, 11b
3	3, 4, 5, 7, & 11b.
6	6, 7, 16 & 17
1 & 3	3, 4, 5, 7, 11b
1, 3 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

BAEC PART(S) HELD	Module Examinations required for conversion to Category TB1.2
2	3, 4, 5, 7, 11b, 16 & 17
3	3, 4, 5, 7, & 11b
6	6, 7, 16 & 17
2 & 3	3, 4, 5, 7, 11b
2, 3 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

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BAEC PART(S) HELD	Module Examinations required for conversion to Category TB1.3
5	3, 4, 5, 7, 12 & 15
4	3, 4, 5, 7 & 12
6	6, 7, 12, 15
4 & 5	3, 4, 5, 7 & 12
4, 5 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>


BAEC PART(S) HELD	Module Examinations required for conversion to Category TB1.4
5	3, 4, 5, 7, 12 & 15
3	3, 4, 5, 7 & 12
6	6, 7, 12, 15
3 & 5	3, 4, 5, 7 & 12
3, 5 & 6	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

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### BAEC to Part-66 AML (AVIONICS) CONVERSIONS WITH EXAMINATIONS

BAEC PART(S) HELD	Module Examinations required for conversion to Category TB2
6	13
7	13
8	13
6 & 7	13
6 & 8	13
7 & 8	13
6, 7 & 8	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>

BAEC PART(S) HELD	Module Examinations required for conversion to Category TB2L (Based on System rating)
6	COM/NAV Submodules 13.1, 13.2, 13.4(a) INSTRUMENTS Submodules 13.1, 13.2, 13.8; Module 14 AUTOFLIGHT Submodules 13.1, 13.2, 13.3(a), 13.7 SURVEILLANCE Submodules 13.1, 13.2, 13.4(b) AIRFRAME SYSTEMS Submodules 13.1, 13.2, 13.11-13.18; Module 14
7	COM/NAV Submodules 13.1, 13.2, 13.4(a) 13.5, 13.9 INSTRUMENTS Submodules 13.1, 13.2, 13.5, 13.8, 13.9; Module 14 AUTOFLIGHT Submodules 13.1, 13.2, 13.3(a), 13.5, 13.7, 13.9 SURVEILLANCE Submodules 13.1, 13.2, 13.5, 13.9, AIRFRAME SYSTEMS Submodules 13.1, 13.2, 13.5, 13.9, 13.11-13.18; Module 14
8	COM/NAV Submodules 13.1, 13.2, 13.4(a) 13.5, 13.9 INSTRUMENTS Submodules 13.1, 13.2, 13.5, 13.9; Module 14 AUTOFLIGHT Submodules 13.1, 13.2, 13.5, 13.7, 13.9 SURVEILLANCE Submodules 13.1, 13.2, 13.4(b), 13.5, 13.9, AIRFRAME SYSTEMS Submodules 13.1, 13.2, 13.5, 13.9, 13.11-13.18; Module 14

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BAEC PART(S) HELD	Module Examinations required for conversion to Category TB2L (Based on System rating)	
6 & 7	COM/NAV INSTRUMENTS AUTOFLIGHT SURVEILLANCE AIRFRAME SYSTEMS	Submodules 13.1, 13.2 Submodules 13.1, 13.2, 13.8; Module 14 Submodules 13.1, 13.2, 13.3(a), 13.7, Submodules 13.1, 13.2 Submodules 13.1, 13.2, 13.11-13.18; Module 14
6 & 8	COM/NAV INSTRUMENTS AUTOFLIGHT SURVEILLANCE AIRFRAME SYSTEMS	Submodules 13.1, 13.2, 13.4(a) Submodules 13.1, 13.2; Module 14 Submodules 13.1, 13.2, 13.3(a), 13.7 Submodules 13.1, 13.2, 13.4(b) Submodules 13.1, 13.2, 13.11-13.18; Module 14
7 & 8	COM/NAV INSTRUMENTS AUTOFLIGHT SURVEILLANCE AIRFRAME SYSTEMS	Submodules 13.1, 13.2, 13.4(a), 13.5, 13.9 Submodules 13.1, 13.2, 13.5, 13.9; Module 14 Submodules 13.1, 13.2, 13.3(a), 13.5, 13.7, 13.9 Submodules 13.1, 13.2, 13.4(b) 13.5, 13.9 Submodules 13.1, 13.2, 13.5, 13.9, 13.11-13.18; Module 14
6, 7 & 8	Contact <a href="mailto:licensing@iaa.ie">licensing@iaa.ie</a>	