



REF: CI-DGCA/01-23, DATED 22ND MAY 2023

**To
The Director General of Civil Aviation
Ministry of Civil Aviation
Government of India
N.Delhi-3.**

SUBJECT: Requesting for widening source to produce more technically skilled manpower to support maintenance and production of Aircrafts and its Parts and components under "Make in India" and "Skill India"

Kind Attn.: Mr. Vikram Dev Dutt, Director General

Honorable Mr. Dutt

With due respect we would like to introduce Centre for Aviation Policy Safety and Research (CAPSR), an independent advocacy and research organization in the field of aviation, in particular; in India, formed and operated by a group of aviators from different verticals of the industry and has many experienced and dedicated professionals as our members contributing for inclusive growth of the aviation sector through this medium.

CAPSR has always raised its voice in support for the all around growth of the industry providing level playing field to all serious stakeholders and this has echoed sentiment of the present regime of India.

We, at CAPSR, always work in the interest of the industry at large and are more concerned about the workforce engaged in this sector. We also do extensive research on the topics related to the development of the industry, finding a sustainable and practical approach

Sir, the purpose of writing this mail is to draw your kind attention to the issue of development of facilities for training of engineering professionals and encouragement of medium and small size of Component MRO in India. We would like to present following facts in this regard

There are two types of training facilities are available to become a certified Aircraft Maintenance Professionals- Basic and Type Training.

Apart from such Academic Module of training, ON JOB TRAINING is also mandatory to become a licensed engineer.

As aviation is an industry where all kind of engineering trade knowledge is required, hence practical experience in different specialized areas such as complete aircraft, engine-PE/JE, Electrical/ Electronics, Radio/ Navigation etc. is mandatory even after academic training.

Basic Aircraft Maintenance Engineer's training is provided by the institutions duly approved by your esteemed office under CAR 147. New regulation of 2019 has structured the course design and other requirements as per EASA 147 guidelines which are grossly implemented now a days in our industry.

Under the current rules to approve AME Training Centre, aircraft and engine MROs approved under CAR 145 are only be eligible. Status of old /existing AME Colleges has been just asked to continue with basic changes incorporated in the course design and on job training requirements.

In this process, CAR 145 Organizations who have approvals in the component/Parts category and follow the same regulation as of aircraft and engine MROs and enjoys the same privileges except permission to develop Basic Aircraft Maintenance Facility under CAR 147.

EASA 147 also does not prohibit component and parts MRO to set up Basic Aircraft Maintenance Training facility and limitation of OJT is similar for all MROs- complete aircraft, engine and parts/components. Relevant extract of EASA documents have been attached with this letter.

Small and Medium Scale CAR 145 organizations are mostly run and operated by the professionals having sufficient experience in the industry. Allowing them to set up AME Training Centre shall not only help them in running Apprenticeship program where the candidate may be employed and trained simultaneously but also candidates will get BASIC training in the field of Aircraft Maintenance on minimal cost.

Introduction of Aerospace and Aviation Sector Skill Council (AASSC) under Skill India Mission(NSDC) in the specialized skill training arena,GOI has plan to produce maximum number of specialized trained professionals(Aircraft Maintenance and Aircraft Manufacturing) to meet the requirement of such professionals in the fast expanding aviation industry.

The colleges under DGCA approvals may also obtain AASSC Approval to widen the horizon of applicability of such high quality trainings and ensure more job opportunities to the trained candidates globally.

Presently we are majorly dependent for specialized training on global training establishments. This is becoming a burden on aircraft operators because they have to pay foreign exchange for such requirements as the end users. Due to change in technology every upgraded model of airplanes comes with new versions of components and due to the reason training and workshops needs regular up gradation. Also, in case of component servicing, sometimes The OEMs do not provide related major maintenance manuals and requisite component servicing Training program so that CAR145/147 organizations may set up their repair/overhaul facility within the country and save the foreign currency.

If a rule is made in such that whenever any new aircraft is introduced to obtain Indian Type Certification or any new model of Parts/Components with superseded part number in front of your esteemed office, the OEM of the aircraft/parts/components must support Indian CAR 145 companies for servicing of the same locally. In this case, he will ensure that requisite training can be obtained in India within the premises of the CAR 145 Companies having CAR 147 approvals and majority of items are serviced/overhauled locally.

Qualified and experienced Aircraft Maintenance professionals will get the opportunity to set up individual item service facilities and lots of employment for our people may happen in these small and medium workshops. The OEM will tie up with the CAR 145 and CAT 147 establishments for training purposes and can provide Component Servicing Manuals to the qualified professionals to open a service facility within the country.

Every aircraft is fitted with over 500 components and most of those are going abroad nowadays. This is not only making aircraft operations costlier but also keeps aircraft on ground for a longer period.

It is just to bring to your kind notice that most of the airlines are facing problems due to this reason. Worldwide facilities are full of business. They are even unable to support Indian requirements on time. Apart from engines we are facing similar dearth in case of propellers, landing gears, and weather radars including even various small critical components.

Introduction of component service facilities with Basic & Type certified training facilities are such a peripheral business area of the aviation industry which in real sense would develop the aviation environment in the country and lots of skilled engineering professionals would get opportunity to serve these verticals.

This is the outcome of our recent research and analysis on the subject: **Next Step to Boost Engineering Support to Aircraft Operators**. We hope this will be further forwarded by your good office to the concerned department and appropriate action will be taken in due course. We are always available for any discussion on the subject and submit our comprehensive global research input in this regard.

Kind Regards

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