

CRD TO EASA NPA 2008-17b

Resulting Text AMC/GM To Part FCL (CRD b.3)

Page 44, 84 - Paragraph No: AMC 1 to FCL 110.H Ex 22c

Comment:

CRD has changed the LAPL Syllabus Ex 22c (page 84) to include 'GPS or VOR' however neither has been included in the in LAPL (H) skill test (page 44). It should be included in the LAPL skill test in the same way that it is included in the PPL(H) Skill Test at AMC 2 to FCL 235.

Justification:

Commonality.

Page 160 - Paragraph No: AMC 1 to FCL 210 & 215

Comment:

EASA Safety Information Bulletin 2009-35 recommended that SFAR 73 training be implemented for Robinson helicopter training in EASA states. The theoretical elements that are mandatory in SFAR 73 are not present in the PPL syllabus. They should now be included at paragraph 082 05 00 00 Main Rotor Mechanics, 082 05 05 00 - Blade Sailing

Justification:

Compliance with EASA SIB 2009-35

Proposed Text:

Add to para 082 05 05 00 Blade Sailing

- Energy management
- Mast bumping
- Low rotor RPM (blade stall)
- Low G hazards
- Rotor RPM decay

Page 161 - Paragraph No: AMC 1 to FCL 210 & 215

Comment:

EASA Safety Information Bulletin 2010-12 'Loss Of Tail Rotor Effectiveness' identified that Loss of Tail Rotor Effectiveness is a contributing factor in a number of accidents and recommended theoretical and flight training be conducted by EASA States. However it is not present in the PPL syllabus at para 082 06 00 00 Tail Rotors and should be included.

Justification:

Compliance with EASA SIB 2009-05

Proposed Text:

Add to para 082 06 01 02 Aerodynamics
- Loss of Tail Rotor Effectiveness

Page 174 - Paragraph No: AMC 2 to FCL 235**Comment:**

Loss of control during inadvertent IMC has been identified as a major contributing factor in helicopter accidents. 'Recovery from Unusual Attitudes' is in the PPL(H) syllabus but not in the skill test. The 180 degree turn with sole reference to instruments, which is listed, cannot resolve disorientation and therefore recovery from unusual attitudes should be included in the PPL(H) skill test - especially given the proposed removal of the 5 hours Instrument Flight from the PPL(H) syllabus.

Justification:

Safety

Proposed Text:

Add to AMC 2 to FCL 235 Section 4
e. Recovery from unusual attitudes with sole reference to instruments.

Page 174, 195 - Paragraph No: AMC 2 to FCL 235 (& AMC 1 to FCL 210.H)**Comment:**

GPS instruction has now been included in addition to the use of VOR in PPL(H) syllabus Ex 22b. However, the PPL(H) Skill Test at Section 3(e) does not specify whether GPS can be used as an alternative to VOR in the test.

Justification:

Clarification required. Can GPS be used instead of VOR?

Proposed Text (if applicable):

Text needs to make the requirement clear.

Page 195 - Paragraph No: AMC 1 TO FCL 210.H Ex 22b**Comment:**

Last line 'appropriate procedures and choice of landing area' is now not consistent with LAPL syllabus Ex 22b, which has now added ' for precautionary landing'.

Justification:

The CRD says that with the reduction in Instrument Flight training, the emphasis now is on precautionary landings in poor weather, consequently this has been included in the LAPL syllabus Ex 22b. However, it has not been added to the PPL (H) syllabus

Proposed Text:

In the PPL(H) syllabus add, after "landing area"- *'for precautionary landings'*

Page 213 - Paragraph No: AMC No.1 to FCL.225.B, Paragraph 3**Comment:**

EASA's response to comment 6807 and related comments has been noted. Following the responses EASA has amended AMC No.1 to FCL.225.B to show 4 distinct balloon groups (A, B, C, D), based on envelope size. These sizes, but without group letters are stated in FCL.225.B

CAA-UK considers that it is not necessary to split the range 4001 to 10500 into two and that the requirements can be simplified to 3 categories.

Justification:

There is not a significant difference in piloting skill required between 4,001 cubic metres and 10500 cubic metres.

Clarification required of allowable progression through groups.

Proposed Text :

In AMC No.1 to FCL.225.B, Paragraph 3.2, replace 7000 by 10500; delete 3.3; rename 3.4 as 3.3.

In FCL.225.B (2)(i), replace 7000 by 10,500. Delete (ii); renumber (iii) and (iv).

Page 551 – Paragraph No: AMC No. 2 to FCL.1015 Paragraph 16**Comment:**

This comment concerns the EASA response to comment 5107 which is about removing the need for aircraft/FSTD to be specifically approved.

Under the provisions of NPA No 2008-22d the process by which a simulator is categorised as specified in the NPA for Part-FCL requires an assessment of the simulator; an approval; and a user approval. The way the Agency has answered the comment could be interpreted to mean that no approval of the simulator is required for skill tests/ proficiency checks. This is not correct.

Justification:

The text may be misunderstood.

Proposed Text:

Clarify that where a specific level of device is required/used that it must comply with the approval requirements as detailed in CS-FSTD(A)

Page 553 – Paragraph No: AMC No 2 to FCL.1015 Paragraph 26**Comment:**

The right for the applicant to repeat an item must be left to the discretion of the examiner. Therefore deleting the sentence is not appropriate. It is considered that there is confusion here between a retest and a repeat. These are different things. The Agency's response is not in alignment with Appendix 4, 7, and 9 that correctly include this as a provision.

Justification:

Consistency and ensuring the examiner has the discretion over repeats but not retests.

Proposed Text:

Do not delete the text.

Page 553 – Paragraph No: GM No. 1 to FCL.1015 Paragraph 3**Comment:**

EASA response to comment 6663 indicates acceptance of the comment and text changed accordingly. The text does not appear to have been changed.

Justification:

Comment response and draft text disagree.

Proposed Text:

30 minutes for single pilot class rating VFR only.

Page 555 – Paragraph No: AMC No 1 to FCL.1020 and FCL.1025 Paragraph 1. a.**Comment:**

The statement that the Senior Examiner must hold a valid/current Flight Examiner Certificate is not correct.

Justification:

A Senior Examiner may hold a Type Rating Examiner Certificate or other examiner certificate appropriate to the role the Competent Authority gives privileges for.

Proposed Text:

- a. Hold a valid/current examiner certificate appropriate to the privileges being given.