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Title	Update of ORO.FC — evidence-based training subtask
NPA Number	NPA 2018-07(B)

UK CAA (European.Affairs@caa.co.uk) has placed **8** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
330	Definitions used in Annexes II to VIII	5 - 6	<p>Page No: 6</p> <p>Paragraph No: Definitions 69(a), and sub-paragraphs (a) and (b), In seat Instruction</p> <p>Comment: We believe the definition of 'In-seat instruction (ISI)' is not very clear and in sub-paragraph (b) there is potential for misinterpretation; we suggest the text '...of intervention by the other pilot, should read '... for intervention by the other pilot' . However, we suggest that the textual changes proposed below will improve the readability and context.</p> <p>Justification: Clarity</p> <p>Proposed Text:</p> <p>(69a) 'in-seat instruction (ISI)' means part of the scenario-based training phase. ISI contains predetermined scripted scenarios the facility within the scenario-based training phase where the instructors can:</p> <p>(a) provide confidentially simple and confidential instructions to one pilot; or</p> <p>(b) perform predetermined exercises acting, in a pilot seat, as pilot flying (PF) or pilot monitoring (PM) for the purposes of demonstration of techniques or and of intervention by the other pilot interaction/intervention.</p>	
331	ARO.OPS.226 Approval and oversight of evidence-based training programmes	6 - 7	<p>Page No: 6</p> <p>Paragraph No: ARO.OPS.226 Approval and oversight of evidence-based training programmes</p> <p>Comment: The IR does not provide any details for instructor training and evaluation. We recommend that a syllabus with appropriate certification/attestation is created.</p> <p>Justification: Standardisation.</p>	
332	ARO.OPS.226 Approval and oversight of evidence-based training programmes	6 - 7	<p>Page No: 6</p> <p>Paragraph No: ARO.OPS.226, Approval and oversight of evidence-based training programmes</p> <p>Comment: We recommend providing clear guidance/criteria on minimum standards to be achieved. This will assist both the operator and the NAA in ensuring the correct metrics are being used.</p>	

			Justification: Standardisation.	
333	ORO.FC.145 Provision of training	7	<p>Page No: 7</p> <p>Paragraph No: ORO.FC.145 Provision of training, sub-paragraph (a)(3)(ii)</p> <p>Comment: We believe the additional paragraph after (a)(3)(ii) regarding the instructor's EBT qualification would be better placed as a new sub-paragraph (b) as shown.</p> <p>Justification: Clarity.</p> <p>Proposed Text:</p> <p style="padding-left: 40px;">(ii) have completed the operator's EBT instructor standardisation.</p> <p>(b) Successful completion of the operator's EBT standardisation will qualify the instructor to perform practical assessment in competencies</p>	
334	ORO.FC.231 Evidence-based training	7 - 9	<p>Page No: 7</p> <p>Paragraph No: ORO.FC.231 Evidence-based training</p> <p>Comment: We are concerned that there are no criteria for measuring concordance. We recommend that clear guidance/criteria on minimum standards to be achieved is provided. This will assist both the operator and the NAA in ensuring the correct metrics are being used.</p> <p>Justification: Clarity and standardisation.</p>	
335	FCL.625 IR — Validity, revalidation and renew	10 - 11	<p>Page No: 10 and 12</p> <p>Paragraph No: FCL.625 IR – Validity, revalidation and renewal</p> <p>Comment: Sub-paragraph (c)(2) states "complete a proficiency check in accordance with Appendix 9 or Appendix 10 to this Part, in the relevant aircraft category."</p> <p>The current requirements in FCL.625 IR sub-paragraph (d) state that if the IR has not been revalidated or renewed within the preceding 7 years, the holder will be required to pass again the IR theoretical knowledge examinations and skill test.</p> <p>Appendix 10, sub-paragraph 5. (c)(1) indicates that the Competent Authority will authorise a nominated person where the operator has an approved procedure for such cases.</p> <p>Clarity is needed on who, how and what evidence will be available to assist operators, training organisations and Competent Authorities to establish when instrument privileges have expired and expired by more than 7 years. It is recommended that further consideration is given to Appendix 10 paragraph 5 to make it clear who will be nominated and what administrative actions need to be taken.</p> <p>Justification: Clarity.</p>	
336	Appendix 10 — Proficiency	12 - 13	Page No: 12	

	check type ratings, and proficiency check for IRs when combined with type rating – Practical assessment in competen		<p>Paragraph No: Appendix 10</p> <p>Comment: We believe there is an issue in identifying credits in association with Appendix 8 of Annex 1 in the current regulation, which lays out the cross crediting of the IR part of a Class or Type Rating Proficiency Check. For pilots who have maintained a type rating and instrument privileges in accordance with Appendix 10, it is unclear what credit will they be able to use towards the revalidation of instrument privileges in other classes or types of aircraft.</p> <p>The CAA would appreciate understanding EASA’s thinking on cross crediting where EBT has been used to maintain the multi-pilot type rating and instrument privileges.</p> <p>Justification: Clarity</p>	
337	GM1X Annex I Definitions	19 - 21	<p>Page No: 19</p> <p>Paragraph No: Practical Assessment</p> <p>Comment: In the discussion point regarding the “Evaluation phase (EVAL)” as defined on Page 18, The following statement is made on page 19:</p> <p><i>The RMG decided to embrace the new philosophy of the draft ICAO Doc 9868 ‘PANS-TRG’ to be soon published. The new paragraph 4.4.1.2.2 is moving the summative assessment that otherwise would be made in the evaluation phase to the end of the module as provided in ORO.FC.231(a) ‘will not continue line operations if during a module the performance observed was below the minimum acceptable level</i></p> <p>It is not clear if the evaluation phase is intended to be in the first assessment or at the end of the module</p> <p>Justification: Clarification needed.</p>	