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Title	Loss of control prevention and recovery training
NPA Number	NPA 2015-13

UK CAA (European.Affairs@caa.co.uk) has placed **11** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
56	Executive Summary	1	<p>Page No: Various</p> <p>Paragraph No: Various throughout the document.</p> <p>Comment: It is strongly recommended that this training should <i>not</i> be restricted to MPA and SP HPCA in the MP role. This training should be embedded in all pilots from the start of training.</p> <p>Justification: If competence in upset recovery and prevention is not delivered effectively at the ab-initio stage, the law of primacy in education will cause any such training delivered after ab-initio (for example; at type rating conversion training) to be eclipsed by the competencies (and any inadequacies therefore) that were first taught.</p> <p>Proposed Text: Wherever the text refers to “multi-pilot aeroplanes and single pilot, high-performance, complex aeroplanes in multi-pilot operations only” it should be changed to read and apply to <u>“all aeroplanes”</u></p>	
57	2. Explanatory Note	4 - 19	<p>Page No: 4</p> <p>Paragraph No: 2.1</p> <p>Comment: It is recommended that any changes should also be focussed on the instructor competencies; not just the licence and type rating training.</p> <p>Justification: Many of the necessary elements and training references covering the issues to be addressed at paragraph 2.1 (for example; stalling on approach, spin avoidance and go around at low altitude) are already required by the regulations for training and flight testing. What appears to be missing therefore, is a satisfactory level of competence in the instructors and ATO's to deliver this training to an effective standard.</p>	
58	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 22</p> <p>Paragraph No: FCL.720.A</p> <p>Comment: FCL.720.A is not considered to be compatible with FCL.725.A. This paragraph makes UPRT a requirement for a “first type rating” whereas FCL.725.A refers specifically to MPA and SP HPCA operated multi-pilot. For example – the BN2T is a type rating, so it is unclear whether UPRT is required or not.</p> <p>Justification: If the requirement for UPRT is to be written into EU legislation, it should be absolutely clear when it is and isn't mandatory.</p>	

59	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.900</p> <p>Comment: A significant amount of type rating training for executive aircraft (business jets) occurs outside EASA member states (e.g. in the USA) and by instructors qualified in accordance with FCL.900 (c). It is recommended that consideration should be given to ensuring that they are required to meet the same requirements as EASA instructors and are equally qualified to deliver UPRT.</p> <p>Justification: Level playing field.</p>
60	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915 (e)(1)(ii)</p> <p>Comment: It is unclear what the justification is for an instructor to have 500 hours flight time and 200 hours instruction in order to teach UPRT.</p> <p>Justification: If one has completed an instructor training course (as FI, CRI or TRI) and has been assessed as competent to instruct all events including UPRT, there should be no further restriction on minimum experience. There is no requirement for a minimal amount of instructional experience to instruct for the aerobatic rating.</p> <p>Proposed Text: Delete FCL.915 (e)(1)(ii)</p>
61	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915(e)(1)(iii)</p> <p>Comment: It is recommended that FI and CRI training and testing in full spinning is mandated.</p> <p>Justification: Many training courses are conducted in aircraft in which full spins are prohibited. This prevents instructors from visiting the full spin and can foster a reluctance to develop the approaching stall in such a way as to promote the incipient spin. This results in the student pilot never seeing or understanding fully the symptoms of the incipient spin. Often the symptoms of the developed spin are never considered. These student pilots later become instructors and examiners. This creates a lack of competence in the instructor base. In turn, this cascades to cement the latent risk that pilots are unable to recognise safely, and in time, the symptoms of the developing stall/spin scenario.</p>
62	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915 (e)(3)</p> <p>Comment: It is unclear how the privilege to instruct UPRT is to be recorded on the licence e.g. perhaps an annotation in the remarks column of Section XII.</p>
63	3. Proposed amendments - 3.1. Draft	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915 (e)(3)</p>

	Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'		<p>Comment: The 3 month "currency" requirement is questioned. There is no equivalent for teaching any other item/manoeuvre in a LAPL, PPL, CPL, class rating, type rating, IR or aerobatic rating syllabus.</p> <p>Justification: This part of the regulation seems overly prescriptive and is considered unworkable in practise.</p>	
64	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915 (e)(3)</p> <p>Comment: Notwithstanding the UK CAA previous comment on this paragraph, it is unclear how the maintenance of privileges i.e. the 3 month currency requirement is to be recorded.</p> <p>Justification: This part of the regulation seems overly prescriptive and is considered unworkable in practise.</p>	
65	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011'	21 - 24	<p>Page No: 23</p> <p>Paragraph No: FCL.915 (e)(5)</p> <p>Comment: This paragraph is not understood; paragraph (e)(1) does not contain privileges that can be 'extended'.</p> <p>Justification: Clarity.</p> <p>Proposed Text: Replace paragraph FCL.915 (e)(5) with the following:</p> <p><u>'An instructor certificate</u> may be extended to include the privilege to instruct in the upset recovery instructor training course, provided that, <u>in addition to paragraph (e)(1)</u>, the instructor has 25 hours of upset recovery instruction experience in an aeroplane and has completed the assessment of competence to demonstrate to a Flight Instructor Examiner (FIE) the ability to instruct in the course.'</p>	
66	3. Proposed amendments - 3.1. Draft Regulation (Draft EASA Opinion) - ANNEX I 'Proposed amendments to Annex I to Commission Regulation (EU) No 1178/2011' - Appendix 9 'Training, skill test and proficiency checks for MPL, ATPL, type and class ratings, and proficiency checks for IR'	26 - 38	<p>Page No: 33</p> <p>Paragraph No: Appendix 9, items 3.7 and 3.71</p> <p>Comment: The constraint on using only FFS is considered overly restrictive. Some aircraft types are perfectly capable of undertaking these items safely e.g. the C510 Mustang. Also, there are still some "in aircraft" type rating courses available where these exercises must be completed in the aircraft otherwise they will not be covered at all.</p> <p>Justification: These items should be available to the instructor/examiner in the aeroplane following the risk assessment and guidance in the ATO operations and training manuals, and as specified in the OEM.</p>	