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<b>Title</b>	Technical review of the TK syllabi, LOs, and examination procedures for ATPL, MPL, CPL, and IRs: Executive summary — Procedural information — Explanatory note — Proposed amendments to Part-FCL, Part-ARA & Part-ORA of the Aircrew Regulation — References
<b>NPA Number</b>	NPA 2016-03(A)

**UK CAA** (European.Affairs@caa.co.uk) has placed **3** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
30	2. Explanatory Note	6 - 27	<p><b>Page No:</b> 10 and 22</p> <p><b>Paragraph No:</b> 2.3 Page 10 and 2.7 Page 22</p> <p><b>Comment:</b> Several Learning Objectives (LO) have been categorised in all subject tables as Basic Knowledge (BK). The intention is that these LOs will be taught by the Approved Training Organisation (ATO) and tested in progress test, but not examined by the National Aviation Authority (NAA) using the European Central Question Bank (ECQB).</p> <p>The LOs that have been identified as BK are the principles on which all topic areas are developed and higher levels of understanding are achieved, therefore, it should be a requirement that these principles are examined. If BK is being taught and tested by the ATO, there is no reason why the ECQB is not used to verify this knowledge and that these principles have been embedded and understood by the student.</p> <p><b>Justification:</b> If BK is removed from the ECQB along with the existing questions, new more complex questions to a higher level will have to be developed to make the examination generate an adequate coverage of all topic areas in individual subjects. This could have a detrimental effect on some students who are naturally nervous when taking examinations, as there will be no BK questions in the test to allow them to build their confidence and they will be seriously disadvantaged by this proposal.</p> <p>The EASA Exams Team require each topic area to be 5 deep with the number of questions available in the ECQB, this will not be achievable in some subjects as it will not be possible to write additional question one topic area.</p> <p>With additional questions examining to a higher level, the table at AMC1 ARA.FCL.300(b), detailing the time allowed for an examination and the number of questions for each topic area, will need to be reviewed to establish if an examination is achievable. We are not aware of any evidence that the RMG have confirmation of this or have carried out any sort of analysis or testing.</p> <p><b>Proposed Text:</b> n/a</p>	
31	2. Explanatory Note	6 - 27	<p><b>Page No:</b> 17</p> <p><b>Paragraph No:</b> Table 1</p>	

			<p><b>Comment:</b> Cost estimates should be reviewed. Table 1 on page 17 gives an overview of one-off cost incurred by ATO for Options 1 and 2. The top part of the table under <b>Producers/Publisher of courseware</b>, list under Option 1 the costs totalling <b>EUR 66,000</b>, however, under Option 2 these cost are listed as <b>n/a</b>.</p> <p><b>Justification:</b> These same costs will be incurred under Option 2 as there still is a requirement to amend textbooks and material, graphics and production and proofreading. The cost to both a large and small ATO if Option 2 is accepted will therefore increase by a further EUR 60,000.</p> <p><b>Proposed Text:</b> To reflect above</p>
32	2. Explanatory Note	6 - 27	<p><b>Page No:</b> 19 and 38</p> <p><b>Paragraph No:</b> Para 1 Page 19 AMC1 to Appendix 3 Page 38</p> <p><b>Comment:</b> AMC1 to Appendix 3 provides tables that list the minimum number of theoretical knowledge hours that are required for each course for the issue of a commercial pilot's licence. It is proposed that these tables are deleted under the NPA. These tables should not be removed.</p> <p><b>Justification:</b> These tables are used as a guide by NAA inspectors when approving an ATO's proposed training course and considerably reduce the amount of time required to carry out this task. Removing the tables from the AMC1 to Appendix 3 will further increase the time required to approve a course of training and may have financial implications for an ATO not being able to deliver a course of training within a timely manner.</p> <p><b>Proposed Text:</b> n/a</p>