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Title	Technical review of the TK syllabi, LOs, and examination procedures for ATPL, MPL, CPL, and IRs: Subjects 010, 031, 032, 033 & 034
NPA Number	NPA 2016-03(C)

UK CAA (European.Affairs@caa.co.uk) has placed **1** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
25	<p>Notice of Proposed Amendment 2016-03(C) — General and specific comments.</p> <p>NOTE: Due to technical issues, the FlashPaper version of this sub-NPA does not contain segments for each Subject. Therefore, when placing comments on this sub-NPA, you are kindly requested to indicate clearly the Subject, topic, subtopic, paragraph and LO number you are commenting on. Example: 'Comment on 032 01 01 01 (01)'.</p>	1	<p>Page No: 101 – 147 Table</p> <p>Paragraph No: n/a</p> <p>Comment: 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>Justification: 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 with 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>Proposed Text: n/a</p>	