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<b>Title</b>	Technical review of the TK syllabi, LOs, and examination procedures for ATPL, MPL, CPL, and IRs: Subject 040 & Area 100 KSA
<b>NPA Number</b>	NPA 2016-03(F)

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

<b>Cmt#</b>	<b>Segment description</b>	<b>Page</b>	<b>Comment</b>	<b>Attachments</b>
25	(General Comments)	0	<p><b>Page No:</b> General Comment</p> <p><b>Paragraph No:</b> n/a</p> <p><b>Comment:</b> The change to the AMC &amp; GM for the introduction of 100 KSA seems to have been written for large ATOs carrying out integrated ATPL courses with in-house students and does not adequately address how smaller ATOs providing distant learning courses can achieve the required outcome or standard. The classroom requirement for ATOs providing modular distance learning courses is:</p> <p><b>ORA.ATO.305 Classroom instruction</b>  <i>(a) An element of classroom instruction shall be included in all subjects of modular distance learning courses.</i>  <i>(b) The amount of time spent in actual classroom instruction shall not be less than 10% of the total duration of the course.</i>  <i>(c) To this effect, classroom accommodation shall be available either at the principal place of business of the ATO or within a suitable facility elsewhere.</i></p> <p><b>Justification:</b></p> <p>Therefore, with the student spending only 10% of the course hours in a classroom, there is insufficient time for an instructor to satisfactorily assess their KSA against the proposed requirements in this NPA. Currently, ATOs providing distant learning use the classroom time to address any shortfalls in a student's knowledge or understanding of a subject(s). If additional classroom time is required for 100 KSA it will substantially increase the costs of the course for the student as they will need to travel more frequently to the ATO, extra accommodation charges and loss of wages with added time off work.</p> <p>This will greatly disadvantage students who do not have the financial backing to attend a full time integrated course of training and realise their ambition of attaining a commercial pilot's licence.</p> <p>The introduction of 100 KSA for distance learning students has not be adequately addressed and has not been sufficiently thought through; it will create 2 tiers of potential pilots with employers undoubtedly favouring integrated student.</p> <p>The NPA for 100 KSA does not provide any guidance on the</p>	

requirements if a student fails to achieve the standards set by the ATO. Is there a period of further training, how many attempts is a student allowed or are they suspended from further training and for how long? There is also the issue of the legal rights of a student to contest his grading and the entitlement to appeal to a higher court of law.

**Proposed Text:** n/a – review content